

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

PLAINTIFFS #1-21, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

COUNTY OF SUFFOLK; SUFFOLK COUNTY POLICE DEPARTMENT; EDWARD WEBBER, individually and in his official capacity; MILAGROS SOTO, individually and in her official capacity; SCOTT GREENE, individually and in his official capacity; BRIDGETT DORMER, individually and in her official capacity; SUPERVISORY JOHN DOE DEFENDANTS, individually and in their official capacities; and JOHN DOE DEFENDANTS, individually and in their official capacities,

Defendants.

Case No.: 2:15-cv-02431-WFK-LB

JOINT PRE-TRIAL ORDER

Pursuant to the Court's August 23, 2021 Order (ECF No. 325), Section V.A of the Court's Individual Motion Practices and Rules, and Federal Rule of Civil Procedure 26(a)(3), Plaintiffs #1-20¹ ("Named Plaintiffs") and Defendants County of Suffolk ("Suffolk County"), Suffolk County Police Department ("SCPD"), Commissioner Edward Webber, Deputy Chief Milagros Soto, Supervisory John Doe Defendants, and John Doe Defendants (the "County Defendants"), (collectively, the "Parties"),² respectfully submit the following proposed joint pre-trial order.

¹ Plaintiff #21 voluntarily dismissed his claims and was dismissed as a party to this litigation. (ECF No. 157).

² Defendant Scott Greene ("Defendant Greene") is proceeding *pro se* and did not participate in the submission of this proposed joint pre-trial order despite multiple efforts by counsel for Named Plaintiffs to include him in the process. On March 11, 2022, counsel for Named Plaintiffs sent a letter to Defendant Greene via email and FedEx advising him of the Court's pretrial scheduling order and submission deadline [ECF No. 325], advising him of the procedures agreed to by counsel for Named Plaintiffs and counsel for County Defendants to facilitate this submission, and providing a copy of Your Honor's Individual Motion Practices and Rules. On March 28, 2022, counsel for Named Plaintiffs provided Defendant Greene (via email and FedEx) copies of (i) Named Plaintiffs' Initial Proposed Joint Pre-Trial Order; (ii) Named Plaintiffs' Initial Deposition

I. FULL CASE CAPTION

1. The full caption of this action is as set forth above.

II. TRIAL COUNSEL

1. The names, law firms, addresses, telephone, and fax numbers of trial counsel are:

Designations; and (iii) Named Plaintiffs' Initial Exhibit List. Counsel for Named Plaintiffs received no response from Defendant Greene to this correspondence. On April 22, 2022, counsel for Named Plaintiffs provided Defendant Greene (via email and FedEx) copies of (i) the Parties' Draft Joint Pre-Trial Order; (ii) Named Plaintiffs' Deposition Designations; (iii) Named Plaintiffs' Exhibit List; and (iv) the County Defendants' Exhibit List. Counsel for Named Plaintiffs received no response from Defendant Greene to this correspondence.

Trial Counsel for Named Plaintiffs

Jose Perez
Jackson Chin
Ghita Schwarz
Nathalia Alejandra Varela
Andrew Claude Case
Fulvia Vargas-De Leon
LATINOJUSTICE PRLDEF
475 Riverside Drive, Suite 1901
New York, NY 10115
Telephone: (212) 219-3360
Fax: (212) 431-4276

Scott A. Edelman
Atara Miller
Katherine K. Fell
Samantha A. Lovin
Griselda Cabrera
MILBANK LLP
55 Hudson Yards
New York, NY 10001-2163
Telephone: (212) 530-5000
Fax: (212) 822-5828

David Marcou
MILBANK LLP
1850 K Street, NW, Suite 1100
Washington, D.C. 20006
Telephone: (202) 835-7516

Trial Counsel for County Defendants

Brian C. Mitchell
Christiana Stover McSloy
Dana L. Kobos
SUFFOLK COUNTY ATTORNEY'S
OFFICE
H. Lee Dennison Building
100 Veteran Memorial Highway
P.O. Box 6100
Hauppauge, NY 11788
Telephone: (631) 853-5834 (Brian C. Mitchell)
(631)853-2944 (Dana L. Kobos)
(631)853-5826 (Christiana McSloy)

Fax: (631) 853-5833

III. JURISDICTION

A. Named Plaintiffs' Statement

1. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1343, and 2201. Supplemental jurisdiction over the state law claims is conferred by 20 U.S.C. § 1367(a).

B. County Defendants' Statement

1. The County Defendants contend that the Named Plaintiffs do not possess claims upon which relief may be granted pursuant to the Fourth, Fifth, and Fourteenth Amendments to

the Constitution of the United States, 42 U.S.C. §1983, Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d and the common law of the State of New York, and that the Court accordingly lacks subject matter jurisdiction under 28 U.S.C. §1331 and §1343 and §1367.

IV. CLAIMS AND DEFENSES

A. Named Plaintiffs' Statement

Named Plaintiffs state that the following claims are to be tried against all Defendants:

1. Defendants violated Named Plaintiffs' rights under the Fourth, Fifth, and Fourteenth Amendments to the United States Constitution, pursuant to 42 U.S.C. § 1983, and Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d.

2. Defendant Suffolk County and Defendant SCPD have subjected Latinos, including Named Plaintiffs, to an ongoing policy, pattern, and practice of discriminatory policing. Specifically, the SCPD has implemented and continues to enforce, encourage, and sanction policies, practices, and/or customs of unconstitutional traffic and pedestrian stops, frisks, detentions, and searches, which are being done without the reasonable suspicion required under the Fourth Amendment. Moreover, many of these illegal police encounters have resulted in the deprivation of property and/or unlawful ticketing of Latino motorists and pedestrians in Suffolk County, including the Named Plaintiffs, in violation of the Fifth Amendment. The SCPD has implemented and continues to enforce, encourage, and sanction policies, practices, and/or customs of using race and/or national origin as the determinative factors in deciding to stop, frisk, detain and/or search individuals, in violation of the Equal Protection Clause of the Fourteenth Amendment and 42 U.S.C. § 2000d.

3. Defendant Suffolk County and Defendant SCPD received both actual and constructive notice of the constitutional violations occurring because of SCPD's policies and practices. Despite being on notice, Defendant SCPD and Defendant Suffolk County (i) maintained

policies and practices that resulted in continued constitutional violations, and (ii) failed to take the actions necessary to investigate and eradicate these practices. As a result, Defendant Suffolk County and Defendant SCPD have not only allowed these discriminatory policies, practices, and/or customs to continue unabated for years, but have facilitated and encouraged them through (i) the failure to adopt and implement adequate police training and supervision policies; (ii) the disruption of the implementation and analysis of traffic stop data collection systems that would have identified officers engaged in discriminatory policing; (iii) the failure to adequately investigate complaints lodged by Latino victims; and (iv) the failure to engage in even-handed law enforcement, in violation of the Equal Protection Clause of the Fourteenth Amendment.

4. Defendant Suffolk County and Defendant SCPD receive federal financial assistance and funding from the United States government, and as such, are required to provide and conduct their programs and activities in a racially and ethnically non-discriminatory manner. Their conduct and omissions continue to deny Named Plaintiffs and other class members of their right to be free from discriminatory treatment under 42 U.S.C. § 2000d.

5. As a result of the policies, practices, and/or customs sanctioned by Defendants Suffolk County and SCPD due to their continuing deliberate indifference to Named Plaintiffs' and the class members' legal rights, Defendants Suffolk County and SCPD have directly and proximately caused the injuries to Named Plaintiffs.

6. Defendant Webber, Defendant Soto, Defendant Greene, and Supervisory John Doe Defendants held or currently hold supervisory positions within the SCPD, and are or were responsible for the policies, practices, and/or customs of the SCPD; the direction of criminal and non-criminal investigations to ensure that appropriate and race-neutral police action is taken with respect to the investigation of crimes and police misconduct perpetrated against Latinos; and the

hiring, screening, training, retention, supervision, discipline, counseling, and control of the police officers under their supervisory command who are or were employed by the SCPD.

7. Defendant Webber, Defendant Soto, Supervisory John Doe Defendants, John Doe Defendants, and Defendant Greene deprived Named Plaintiffs and class members of their constitutional right to be free from unreasonable searches and seizures and other discriminatory practices, and to Equal Protection under the law, and are liable under the Fourth, Fifth, and Fourteenth Amendment, as well as 42 U.S.C. § 1983.

8. Acting under the color of law and without any basis to form a reasonable suspicion that Named Plaintiffs, and others similarly situated, were engaged or about to engage in unlawful activity, Defendant Webber, Defendant Soto, Supervisory John Doe Defendants, and in particular, John Doe Defendants and Defendant Greene subjected Named Plaintiffs and other class members to unequal treatment by unlawfully (i) targeting Latino motorists for illegal traffic stops; (ii) targeting Latinos through unjustified checkpoints; (iii) targeting Latinos in a “stop-and-rob” scheme that resulted in the wrongful deprivation of property during unconstitutional traffic stops; and (iv) failing to adequately investigate crimes and police misconduct perpetrated against Latinos. Through these actions, Defendant Webber, Defendant Soto, Supervisory John Doe Defendants, John Doe Defendants, and Defendant Greene intentionally deprived Named Plaintiffs of the following constitutional rights: (1) to be free from unreasonable searches and seizures; (2) to due process under the law with respect to their property rights; and (3) to Equal Protection under the law. Accordingly, Defendant Webber, Defendant Soto, Supervisory John Doe Defendants, John Doe Defendants and Defendant Greene are liable under the Fourth and Fourteenth Amendments and 42 U.S.C. § 1983.

9. Defendant Webber, Defendant Soto, Supervisory John Doe Defendants, and

Defendant Greene had both actual and constructive notice that members of the SCPD were violating Named Plaintiffs' and other class members' constitutional rights under the Fourth, Fifth, and Fourteenth Amendments, and could have taken action to investigate, address, and prevent violations of the Named Plaintiffs' and class members' legal rights, but they did not. Instead, they knowingly and deliberately failed and refused to do so despite the availability and presentation of evidence suggesting that biased policing was, in fact, occurring, that officers were participating in a "stop-and-rob" scheme, and/or that claims of SCPD misconduct by Latinos in Suffolk County were being ignored and left uninvestigated, evincing deliberate indifference to Named Plaintiffs' and class members' legal rights, resulting in their injuries.

10. As a proximate cause of the foregoing, Named Plaintiffs and members of the class have and will continue to suffer irreparable loss and injury, including but not limited to: (i) economic loss, (ii) humiliation; (iii) embarrassment; (iv) physical and emotional distress, (v) mental anguish; (vi) low self-esteem; and (vii) deprivation of their civil rights. For these injuries, Named Plaintiffs seek declaratory and injunctive relief. Specifically, Named Plaintiffs, as class representatives, seek declaratory and injunctive relief including (but not limited to) the following: (i) the retention of an independent monitor to assess, ensure compliance, and request modifications and additions to SCPD's policies, practices, and customs; (ii) the implementation of a new Early Intervention System; (iii) updates to SCPD's traffic stop data collection practices and procedures, including the collection of traffic stop data in real-time, the retention of a traffic stop data expert, and the production of an annual traffic stop data report; and (iv) changes to the policies and procedures of the Internal Affairs Bureau. Named Plaintiffs also seek punitive and compensatory

damages.³

Named Plaintiffs state the following additional claim is to be tried only against Defendant Greene:

11. Defendant Greene violated certain Named Plaintiffs' rights under the common laws of the State of New York. Specifically, Defendant Greene unlawfully took the personal property (money) of certain Named Plaintiffs during the course of unjustified and unlawful traffic and pedestrian stops. Named Plaintiffs had legal ownership over the money in their possession when they were stopped by Defendant Greene. By these actions, Defendant Greene violated certain Named Plaintiffs' possession and right to possession of that money and is liable for conversion of property. Defendant Greene's conduct was so egregious that certain Named Plaintiffs are also entitled to punitive and/or exemplary damages.

Named Plaintiffs state the following claims are not to be tried:

12. Named Plaintiffs' claims against Officer Bridgett Dormer for violations under the Fourth, Fifth, and Fourteenth Amendment, pursuant to 42 U.S.C. § 1983, and for conversion.⁴

Named Plaintiffs state the following defenses are to be tried:⁵

13. Whether Defendant Greene's counterclaim against Named Plaintiffs fails to state a claim upon which relief can be granted.

³ Named Plaintiffs reserve the right to seek monetary damages, both individually and on a class wide basis.

⁴ Claims against Officer Dormer were dismissed without prejudice. (Dkt. 322.)

⁵ By setting forth specific defenses herein, Named Plaintiffs do not waive any other defenses which may exist at law. Nor do Named Plaintiffs relieve Defendant Greene of any of his burden of proof or persuasion at trial which the law imposes on Defendant Greene. Named Plaintiffs expressly reserve the right to amend their statement of the claims and defenses to be tried prior to and during trial of this matter, in accordance with the Court's rules.

14. Whether Defendant Greene's counterclaim against Named Plaintiffs is barred by applicable statutes of limitations and/or statutes of repose.

15. Whether allegations made by Named Plaintiffs in this action were absolutely and/or qualifiedly privileged.

16. Whether Defendant Greene's counterclaim is barred by the absolute litigation privilege and/or the doctrine of qualified immunity under New York Law.

17. Whether the allegations made by Named Plaintiffs in this action were within the sphere of legitimate public interest and concern and were reasonably related to matters warranting public exposition.

18. To the extent Defendant Greene's counterclaim against Named Plaintiffs can be read as one for slander or libel, whether Defendant Greene can (a) demonstrate that the allegations made by Named Plaintiffs in this action are false; (b) demonstrate that the allegations made by Named Plaintiffs in this action were made negligently or with actual malice; (c) demonstrate that he experienced an injury or actual damages as a result of the allegations made by Named Plaintiffs in this action; and (d) demonstrate that the allegations made by Named Plaintiffs in this action were defamation *per se*.

19. Whether the allegations made by the Named Plaintiffs in this action are true or substantially true.

20. Whether Defendant Greene suffered any losses or damages proximately caused by the conduct alleged in his counterclaim.

21. Whether damages alleged to have been sustained by Defendant Greene, if any, were caused by Defendant Greene's own culpable conduct.

22. Whether Defendant Greene failed to mitigate any damages he may have suffered.

23. Whether Defendant Greene is entitled to exemplary or punitive damages, recovery of attorneys' fees or experts' fees, or costs of suit.

24. Whether Defendant Greene has an adequate remedy at law, to the extent his counterclaim seeks equitable relief.

25. Whether Defendant Greene's counterclaim is barred by the doctrines of estoppel, unclean hands, and/or in pari delicto.

B. County Defendants' Statement

1. The complaint fails to state a claim upon which relief can be granted. The County Defendants contend that no policy, statement, ordinance, regulation or decision officially adopted and/or promulgated by defendants or otherwise ratified by the County Defendants authorized a deprivation of plaintiffs' constitutional rights. The County Defendants do not maintain policies or practices that resulted in constitutional violations of Latino citizens in violation of 42 U.S.C. §1983. The County Defendants acted in what they did, if at all, solely pursuant to their duties and responsibilities as law enforcement officials, and at all times acted in good faith in that they were exercising and acting within their statutory and constitutional powers.

2. The claims against Defendants Webber and Soto must be dismissed as they had no personal involvement in the alleged violations committed by Defendant Greene. The actions of Webber led to the sting operation that resulted in the arrest and prosecution of Defendant Greene.

3. There is no evidence that either Defendant Webber or Defendant Soto was aware of any unconstitutional conduct and failed to take remedial action, or that either defendant was indifferent to the rights of the Named Plaintiffs pursuant to §1983.

4. Solely pursuant to their duties and responsibilities as law enforcement officials, Webber and Soto, at all times acted in good faith in that they were exercising and acting within their statutory and constitutional powers. Their actions were justified by the facts and

circumstances presented. Additionally, they acted reasonably and in good faith in the discharge of their official duties and responsibilities and reasonably believed that their conduct was lawful, and are consequently entitled to judgment in their favor on the basis of qualified immunity. It was objectively reasonable for Webber and Soto to believe that their actions did not violate clearly established law in relation to the investigation into Defendant Greene's misconduct, as well as other instances of allegedly discriminatory policing in Suffolk County.

5. The County Defendants did not discriminate against the Named Plaintiffs or other class members on the basis of race pursuant to Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d. There is no evidence that County Defendants intentionally discriminated against any Named Plaintiffs or other class members or that discrimination was a substantial or motivating factor for any of the County Defendants' actions.

6. Moreover, any stops, arrests, detentions or summons' issued to the Named Plaintiffs or other class members in this matter were reasonable based upon probable cause to believe that the Named Plaintiffs or other class members committed a traffic infraction, offense or a crime. The actions by the County Defendants relative to the Named Plaintiffs or other class members were reasonable under the circumstances. Moreover, the County Defendants contend that the damages sustained by the Named Plaintiffs, if any, were caused by their own culpable and/or negligent conduct, or by the unlawful actions of defendant, Scott Greene. To the extent that the amended complaint purports to set forth derivative claims under 42 U.S.C. § 1983, said claims are not cognizable in law.

7. Named Plaintiffs or other class members are not entitled to declaratory judgment or injunctive relief relative to this matter.

8. The Suffolk County Police Department is not an entity susceptible to suit.

9. County Defendants submit that no viable claims exist against any yet to be identified Supervisory John Doe Defendants or John Doe Defendants.

10. The action against defendant Bridget Dormer has been dismissed. Moreover, the cross-claim of Defendant Greene against the County Defendants has been dismissed. There are no state law claims against County Defendants. The only remaining state law claims exist against Defendant Greene for conversion. Defendant Greene is not represented by the Suffolk County Attorney's Office. Additionally, the state law claim against defendant Dormer for conversion is dismissed as all of plaintiffs' claims against defendant Dormer have been dismissed

V. TRIAL DAYS

1. This case is to be tried before a jury.
2. The Parties estimate that approximately 15 full trial days will be necessary in this action. This estimate excludes jury selection and opening and closing arguments.

VI. CONSENT TO TRIAL BY MAGISTRATE JUDGE

1. The Parties do not consent to trial by Magistrate Judge.

VII. STIPULATIONS OF LAW

The Parties have agreed to stipulate that the following law applies:

1. Pursuant to Title VI of the Civil Rights Act of 1964 and 42 U.S.C. § 2000d, “[n]o person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

2. To prevail on a claim pursuant to 42 U.S.C. § 1983 against a municipality based on acts of a public official, a plaintiff must show that an official policy of the municipality caused the

plaintiff to be deprived of a constitutional or statutory right resulting in plaintiff suffering a constitutional injury.

3. An official policy or custom may be found where: (i) the practice is so consistent and widespread that although not expressly authorized it constitutes a custom or usage of which a supervising policy-maker must have been aware of; or (ii) there is a failure to provide adequate training or supervision to subordinates to such an extent that it amounts to deliberate indifference to the rights of those who come in contact with the municipal employees.

4. A plaintiff must show that the official policy or custom was the proximate cause of the deprivation of their constitutional rights. The constitutional deprivation must be a reasonably foreseeable consequence of defendant's conduct.

5. To prevail on a claim pursuant to 42 U.S.C. § 1983 against a supervisory official in his or her individual capacity, a plaintiff must show personal involvement by the supervisory official in the constitutional violation.

6. To prevail on a claim for violation of the Fourth Amendment, a plaintiff must show that a defendant performed a search or seizure without reasonable suspicion.

7. To prevail on a claim for violation of the Fifth Amendment, a plaintiff must show that a defendant deprived them of property without due process of law.

8. To prevail on a claim for violation of the Equal Protection Clause of the Fourteenth Amendment, a plaintiff must show that a defendant took official action that was motivated at least in part by a racially discriminatory purpose.

VIII. STIPULATIONS OF FACT

The Parties have agreed to stipulate to the following facts as set forth below:

1. Defendant Scott Greene was arrested on January 30, 2014, during an undercover sting operation.

2. In January 2016, a jury found Defendant Greene guilty of multiple counts of grand larceny, petit larceny, and official misconduct.

3. In April 2016, Defendant Greene pled guilty to additional charges of grand larceny and petit larceny.

4. On January 13, 2014, Defendants Suffolk County and SCPD entered into an agreement with the DOJ (the "Settlement Agreement").

5. On April 29, 2015, the Named Plaintiffs filed the complaint in the instant matter.

6. On May 18, 2015, the Named Plaintiffs filed an amended complaint.

7. On November 2, 2018, Plaintiff #21 voluntarily dismissed all his claims in this action.

8. On May 29, 2019, Defendant Scott Greene filed an answer to the amended complaint, and brought a cross-complaint against the County Defendants and a counterclaim against the Named Plaintiffs.

9. At the relevant times in the amended complaint, defendant Milagros Soto was employed by the Suffolk County Police Department.

10. Defendant Edward Webber began his service as the Acting Commissioner of the Suffolk County Police Department in January of 2012.

11. Defendant Edward Webber was appointed Commissioner of the Suffolk County Police Department on July 25, 2012, and served in that role through January of 2016.

IX. TRIAL WITNESSES

1. The Parties each hereby submit a list of trial witnesses to the Court, as outlined below. The Parties' witness lists, for each witness, state whether the Party "will" or "may" call the witness at trial; state whether the witness is expected to testify in person or by deposition; and provide a brief summary of the substance of the witness's testimony.

2. The Parties reserve and do not waive all other rights and objections, including without limitation the right to supplement and amend upon a showing of good cause, their proposed trial witnesses. The Parties also specifically reserve the rights to: (a) narrow the list of witnesses; (b) elicit and introduce testimony of any witness(es) called by another party; (c) make good-faith adjustments to the order of witnesses (once notice of order is provided) subject to witness availability; and (d) object to any trial testimony offered by any witness not identified in this Order.

3. The Parties agree that, to the extent they plan to call additional witnesses, they will give each other fair and reasonable notice under the circumstances.

A. Named Plaintiffs' Witnesses⁶

1. Plaintiff #1 (may call in person), 475 Riverside Dr. #1901, New York, NY 10115:⁷ Plaintiff #1 will testify about his experience being stopped by an agent of SCPD, without good reason, multiple times since 2012. Plaintiff #1 was stopped and pulled over by Defendant Greene a total of four times between 2012 and 2014, and robbed by Defendant Greene on three of those four occasions.

2. Plaintiff #2 (may call in person), 475 Riverside Dr. #1901, New York, NY 10115: Plaintiff #2 will testify about his experience being stopped by an agent of SCPD, without good reason, at least once since 2012. Plaintiff #2 was stopped, pulled over, and robbed by Defendant Greene on June 12, 2012.

⁶ Named Plaintiffs reserve their right to call any witness identified by any of the Defendants, whether or not the Defendants actually call such witnesses to testify at trial. (Such witnesses are hereby incorporated by reference.)

⁷ The address for all Named Plaintiffs is the LatinoJusticePLRDEF Headquarters, 475 Riverside Dr. #1901, New York, NY 10115.

3. Plaintiff #3 (may call in person), 475 Riverside Dr. #1901, New York, NY

10115: Plaintiff #3 will testify about his experience being stopped by an agent of SCPD, without good reason, multiple times since 2012. Plaintiff #3 was stopped, pulled over, and robbed by Defendant Greene in or around the summer of 2012.

4. Plaintiff #4 (may call in person), 475 Riverside Dr. #1901, New York, NY

10115: Plaintiff #4 will testify about his experience being stopped by an agent of SCPD, without good reason, at least once since 2013. Plaintiff #4 was stopped, pulled over, and robbed by Defendant Greene in or around October of 2013.

5. Plaintiff #5 (may call in person), 475 Riverside Dr. #1901, New York, NY

10115: Plaintiff #5 will testify about his experience being stopped by an agent of SCPD, without good reason, multiple times since 2013. Plaintiff #5 was stopped, pulled over, and robbed by Defendant Greene in or around 2013.

6. Plaintiff #6 (may call in person), 475 Riverside Dr. #1901, New York, NY

10115: Plaintiff #6 will testify about his experience being stopped by an agent of SCPD, without good reason, at least once since 2013. Plaintiff #6 was the passenger in a vehicle that was stopped, pulled over, and robbed by Defendant Greene in or around January 2013.

7. Plaintiff #7 (may call in person), 475 Riverside Dr. #1901, New York, NY

10115: Plaintiff #7 will testify about his experience being stopped by an agent of SCPD, without good reason, multiple times since 2013. Plaintiff #7 was stopped, pulled over, and robbed by Defendant Greene in or around January 2013.

8. Plaintiff #8 (may call in person), 475 Riverside Dr. #1901, New York, NY

10115: Plaintiff #8 will testify about his experience being stopped by an agent of SCPD, without

good reason, multiple times since 2011.⁸ Plaintiff #8 was stopped, pulled over, and robbed by Defendant Greene in or around January 2013.

9. Plaintiff #9 (may call in person), 475 Riverside Dr. #1901, New York, NY 10115: Plaintiff #9 will testify about his experience being stopped by an agent of SCPD, without good reason, at least twice since 2013. Plaintiff #9 was stopped and pulled over by Defendant Greene twice in 2013 and robbed by Defendant Greene on one of those two occasions.

10. Plaintiff #10 (may call in person), 475 Riverside Dr. #1901, New York, NY 10115: Plaintiff #10 will testify about his experience being stopped by an agent of SCPD, without good reason, multiple times since 2010.⁹ Plaintiff #10 was stopped, pulled over, and robbed by Defendant Greene on multiple occasions, starting in or around 2010. Additionally, Plaintiff #10 will testify how at least on one occasion Defendant Greene followed him into his home without permission.

11. Plaintiff #11 (may call in person), 475 Riverside Dr. #1901, New York, NY 10115: Plaintiff #11 will testify about her experience being stopped by an agent of SCPD, without good reason, multiple times since 2010.¹⁰ Plaintiff #11 was stopped and pulled over by Defendant Greene on multiple occasions, without good reason, starting in or around 2010. Additionally,

⁸ County Defendants object to Plaintiff #8 testifying about his experiences being stopped by an agent of SCPD prior to 2012, as anything prior to 2012 is outside of the relevant time-period for this case.

⁹ County Defendants object to Plaintiff #10 testifying about his experiences being stopped by an agent of SCPD prior to 2012 or his experiences being stopped, pulled over and robbed by Defendant Greene prior to 2012, as anything prior to 2012 is outside of the relevant time-period for this case.

¹⁰ County Defendants object to Plaintiff #11 testifying about his experiences being stopped by an agent of SCPD prior to 2012 or his experiences being stopped and pulled over by Defendant Greene prior to 2012, as anything prior to 2012 is outside of the relevant time-period for this case.

Plaintiff #11 will testify how Defendant Greene entered her home on multiple occasions without permission.

12. **Plaintiff #12 (may call in person), 475 Riverside Dr. #1901, New York, NY**
10115: Plaintiff #12 will testify about his experience being stopped by an agent of SCPD, without good reason, multiple times since moving to Suffolk County.¹¹ Plaintiff #12 was stopped, pulled over, and robbed by Defendant Greene in or around the summer of 2012.

13. **Plaintiff #13 (may call in person), 475 Riverside Dr. #1901, New York, NY**
10115: Plaintiff #13 will testify about his experience being stopped by an agent of SCPD, without good reason, at least four times since 2013. Plaintiff #13 was stopped, pulled over, and robbed by Defendant Greene twice in 2013.

14. **Plaintiff #14 (may call in person), 475 Riverside Dr. #1901, New York, NY**
10115: Plaintiff #14 will testify about his experience being stopped by an agent of SCPD, without good reason, multiple times since 2012. Plaintiff #14 was stopped and pulled over twice by Defendant Greene and robbed on one of those two occasions.

15. **Plaintiff #15 (may call in person), 475 Riverside Dr. #1901, New York, NY**
10115: Plaintiff #15 will testify about his experience being stopped by an agent of SCPD, without good reason, at least once since 2012. Plaintiff #15 was stopped, pulled over, and robbed by Defendant Greene in or around May 2012.

16. **Plaintiff #16 (may call in person), 475 Riverside Dr. #1901, New York, NY**
10115: Plaintiff #16 will testify about his experience being stopped by an agent of SCPD, without

¹¹ County Defendants object to Plaintiff #12 testifying about his experiences being stopped by an agent of SCPD prior to 2012, as anything prior to 2012 is outside of the relevant time-period for this case.

good reason, at least once since 2012. Plaintiff #16 was stopped, pulled over, and robbed by Defendant Greene in or around the summer of 2012.

17. **Plaintiff #17 (may call in person), 475 Riverside Dr. #1901, New York, NY**
10115: Plaintiff #17 will testify about his experience being stopped by an agent of SCPD, without good reason, multiple times since 2010.¹² Plaintiff #17 was stopped, pulled over, and robbed by Defendant Greene in or around the summer of 2010.

18. **Plaintiff #18 (may call in person), 475 Riverside Dr. #1901, New York, NY**
10115: Plaintiff #18 will testify about his experience being stopped by an agent of SCPD, without good reason, at least twice since 2013. On one of these occasions, in or around June 2013, Plaintiff #18 was stopped, pulled over, and robbed by Defendant Greene.

19. **Plaintiff #19 (may call in person), 475 Riverside Dr. #1901, New York, NY**
10115: Plaintiff #19 will testify about his experience being stopped by an agent of SCPD, without good reason, multiple times since 2012. Plaintiff #19 was stopped and pulled over by Defendant Greene approximately five times between 2012 and 2015, and robbed by Defendant Greene on one of those five occasions.

20. **Plaintiff #20 (may call in person), 475 Riverside Dr. #1901, New York, NY**
10115: Plaintiff #20 will testify about his experience being stopped by an agent of SCPD, without good reason, at least twice since 2013. On one of these occasions, Plaintiff #20 was stopped, pulled over, and robbed by Defendant Greene.

21. **James Burke (may call in person or by deposition), 30 Yaphank Avenue,**

¹² County Defendants object to Plaintiff #17 testifying about his experience being stopped by an agent of SCPD or Defendant Greene prior to 2012 as anything prior to 2012 is outside of the relevant time-period for this case.

Yaphank, New York, 11980: Burke is expected to testify about his experience as Chief of Department of the SCPD from January 1, 2012, until his resignation on October 27, 2015. Burke is expected to testify about topics including his supervisory responsibilities over SCPD officers, the circumstances and events surrounding SCPD's entering into the Settlement Agreement and implementation thereof, and the investigation into Defendant Greene's misconduct.

22. Michael Caldarelli (may call in person or by deposition), 30 Yaphank Avenue, Yaphank, New York, 11980: Caldarelli is expected to testify about his experience as Commanding Officer of the IAB from October 2012 to October 2014. In particular, he is expected to testify about his experience at IAB, including its staffing, the timeliness and sufficiency of its investigations, and the reasons for his transfer out of IAB, the investigation into Defendant Greene's misconduct, and the involvement and awareness of senior officials in these matters.

23. Christopher Corsino (may call in person or by deposition), 30 Yaphank Avenue, Yaphank, New York, 11980: Corsino is expected to testify about his experience as a Lieutenant in the IAB and later Lieutenant in the Seventh Precinct. Additionally, Corsino is expected to testify about his experience working on the investigation and sting operation of Defendant Greene, his experience as part of the SCPD-IAB task force created after Defendant Greene's arrest, and his role in authoring the internal memorandum focused on the investigation of Defendant Greene.

24. Bridgett Dormer (may call in person or by deposition), 30 Yaphank Ave., Yaphank, New York 11980: Dormer is expected to testify about her experience as an SCPD officer in the Third Precinct.

25. Scott Greene (will call in person), 41 Westwood Dr., Shirley, New York 11967: Defendant Greene is expected to testify about his experience working as an SCPD officer,

including his experience conducting traffic stops, conducting checkpoints, and investigating complaints. He is also expected to testify about his duties and authorities as a sergeant and supervisor within the SCPD, the allegations raised against him, and the investigation into these allegations, including the criminal investigation and trial stemming from the allegations against him by Plaintiffs #2, #3, and #19. Additionally, Defendant Greene is expected to testify about SCPD's general practices and his opinion and perception of SCPD's culture from his time working as an SCPD officer.

26. Robert Lehmann (may call in person or by deposition), 30 Yaphank Avenue, Yaphank, New York, 11980: Lehmann is expected to testify about his experience in his various roles at the SCPD and as a sergeant in IAB. Additionally, Lehmann is expected to testify about topics including complaint intake procedures, in particular the complaint against Defendant Greene, his knowledge of the investigation surrounding Defendant Greene, and the investigation procedures for bias-based policing, early warning alerts, and traffic stop complaints.

27. Christopher Love (will call in person), 30 Yaphank Avenue, Yaphank, New York, 11980: Love is expected to testify about his experience as a sergeant in the IAB from 2009 to 2013 and his experience as SCPD's compliance coordinator with respect to the Settlement Agreement. Love is also expected to testify about several topics including: (i) the organizational structure of the SCPD; (ii) the functions of each of SCPD's bureaus, departments, offices, precincts, or similar groups; (iii) SCPD officers and employees, and their roles; (iv) the supervisory and reporting structure of the SCPD; (v) the relationship between the SCPD, Suffolk County District Attorney's Office, and Suffolk County; (vi) the circumstances and events surrounding the United States' joint investigation of the SCPD, the Technical Assistance Letter, the Settlement Agreement and implementation thereof; (vii) SCPD's policies, systems, trainings, programs, or

audits, (viii) traffic stops, checkpoints, and traffic stop data collection; (ix) discriminatory policing or other misconduct against Latinos; and (x) any investigation undertaken by Suffolk County to identify other SCPD members who may have engaged in similar misconduct to that of Defendant Greene.

28. **JoAnn McLaughlin (may call in person or by deposition), 30 Yaphank Avenue, Yaphank, New York, 11980:** McLaughlin is expected to testify about the IAB in her capacity as Deputy Chief and Commanding Officer of IAB.

29. **John Meehan (may call in person or by deposition), 30 Yaphank Avenue, Yaphank, New York, 11980:** Meehan is expected to testify about his experience as SCPD Chief of Patrol and about SCPD's policies and procedures regarding bias-based policing, traffic stop data collection, and checkpoints. He is also expected to testify about his experience supervising those responsible for intaking and investigating biased-based policing complaints.

30. **Milagros Soto (will call in person), 30 Yaphank Ave., Yaphank, New York 11980:** Soto is expected to testify about her experience working in IAB and the procedures for investigating complaints made to IAB. She is also expected to testify about the investigation into Defendant Greene's misconduct and about SCPD's efforts to monitor bias-based policing.

31. **Armando Valencia (may call in person or by deposition), 30 Yaphank Avenue, Yaphank, New York, 11980:** Valencia is expected to testify about his experience as a Deputy Inspector at SCPD from 2000 to 2016, as well as his experience as the Commanding Officer in the IAB. Valencia is expected to testify on topics including the complaint intake process, complaint investigation process (including the process by which complaints containing allegations of discriminatory policing were categorized), the early intervention system, and language access. He

is also expected to testify about his work to ensure SCPD's compliance with the DOJ Agreement and the Technical Assistance Letter.

32. Donald Meyers (may call in person or by deposition), 30 Yaphank Avenue, Yaphank, New York, 11980: Meyers is expected to testify about his role in the IAB investigation of Defendant Greene.

33. Edward Webber (may call in person) 30 Yaphank Avenue, Yaphank, New York, 11980: Webber is expected to testify about his experience in his various roles at the SCPD, including his time as Commissioner of the SCPD. Webber is expected to testify about topics including his supervisory responsibilities over SCPD officers, the circumstances and events surrounding SCPD's entering into the Settlement Agreement and implementation thereof, the investigation into Defendant Greene's misconduct, and his discussions with Caldarelli regarding the IAB, including its staffing, the timeliness and sufficiency of its investigations.

34. Michael Smith (will call in person), 501 W. Cesar E. Chavez Blvd, San Antonio, TX 78027: Dr. Smith will testify about the expert report he prepared in this matter. Dr. Smith examined: (i) the adequacy of the traffic and checkpoint data collected by SCPD from 2010 to the present; (ii) SCPD's ability to assess whether Latinos were disproportionately subjected to traffic and or checkpoint stops or treated in a disparate manner after being stopped by SCPD using the data collected from 2019 to the present; and (iii) whether the data collected by SCPD from 2010 to 2018 indicates that Latinos were disproportionately subjected to traffic or checkpoint stops or treated in a disparate manner after being stopped.¹³

¹³ County Defendants object to Michael Smith testifying about any data prior to 2012, as it is outside of the statutory period. Judge Gary R. Brown previously ruled that "Based on the defense raised by the County in regard to statute of limitations, under no circumstances are plaintiffs entitled to data that dates prior to 2012." [Dkt. 99].

35. **Robert Stewart (will call in person), P.O. Box 14063, Tallahassee, FL 32317:**

Stewart will testify about the expert report he prepared in this matter. Stewart evaluated SCPD's policies, procedures, training, practices, supervisory and disciplinary systems, and organizational culture from January 1, 2010 through the present.¹⁴

B. County Defendants' Witnesses

1. The County Defendants reserve their right to offer the relevant and admissible testimony of any and all witnesses identified by the plaintiffs, whether or not the plaintiffs actually call such witnesses at the time of trial. (Such witnesses are hereby incorporated by reference.)

2. County Defendants may call the following witnesses:

a. **Suffolk County Police Department Deputy Chief Milagros Soto, 30 Yaphank Avenue, Yaphank, New York, 11980:** Soto is expected to testify regarding the Scott Greene investigation, IAB, the Settlement Agreement and the operations of the Suffolk County Police Department, and the Suffolk County Police Department's treatment, outreach and policies toward Latino individuals within Suffolk County.

b. **Lieutenant Donald Mayers, 30 Yaphank Avenue, Yaphank, New York, 11980:** Mayers is expected to testify regarding the Scott Greene investigation and IAB.

c. **Sergeant Christopher Love, 30 Yaphank Avenue, Yaphank, New York, 11980:** Love is expected to testify regarding the Department of Justice Settlement Agreement and the operations of the Suffolk County Police Department.

¹⁴ County Defendants object to Robert Stewart testifying about policies, procedures, training, practices, supervisory and disciplinary systems, and organizational culture prior to 2012 as it is outside of the statutory period. Judge Gary R. Brown previously ruled that "Based on the defense raised by the County in regard to statute of limitations, under no circumstances are plaintiffs entitled to data that dates prior to 2012." [Dkt. 99].

d. **Gregory J. Anderson, 6 Fox Run Drive, Newark, Illinois 60541:** Anderson is expected to testify as an expert witness relative to County Defendants' police practices and those matters contained within the expert report that he prepared regarding this matter.

e. **Assistant District Attorney Joseph Carroll, Suffolk County District Attorney's Office – William J. Lindsay County Complex – Building 77, Veterans Memorial Highway, Hauppauge, NY 11788:** Carroll is expected to testify for purposes of impeachment or rebuttal regarding the sting operation and prosecution of Defendant Greene and Carroll's role in helping certain Named Plaintiffs with their U-Visa applications, along with communications between Carroll and members of LatinoJusticePLRDEF relative to the criminal cases against Defendant Greene and interactions with the Named Plaintiffs as they relate to the Named Plaintiffs' claimed damages.

f. **Assistant District Attorney Melisa Bliss, Suffolk County District Attorney's Office – William J. Lindsay County Complex – Building 77, Veterans Memorial Highway, Hauppauge, NY 11788:** Bliss is expected to testify for purposes of impeachment or rebuttal regarding the sting operation and prosecution of Defendant Greene and Bliss' role in helping certain Named Plaintiffs with their U-Visa applications, along with communications between Bliss and members of LatinoJusticePLRDEF relative to the criminal cases against Defendant Greene and interactions with the Named Plaintiffs as they relate to the Named Plaintiffs' claimed damages.¹⁵

¹⁵ Named Plaintiffs object on multiple grounds to Assistant District Attorney Joseph Carroll and Assistant District Attorney Melisa Bliss being called as witnesses. These witnesses were not previously disclosed to Named Plaintiffs, as is required by Federal Rule of Civil Procedure ("FRCP") 26(a)(1)(A). County Defendants also did not provide any supplemental disclosures

g. **Suffolk County Police Department Detective Lieutenant Christopher D. Corsino, 30 Yaphank Avenue, Yaphank, New York, 11980:** Corsino is expected regarding the Scott Greene investigation and IAB.

h. **Detective Sergeant David Tricamo, 30 Yaphank Avenue, Yaphank, New York, 11980:** Tricamo is expected to testify regarding the Scott Greene investigation and sting operation leading to the arrest of Defendant Greene.

2. The address for all current and former Suffolk County Police Department employees except for Defendant Greene is Suffolk County Police Department Headquarters - 30 Yaphank Avenue, Yaphank, New York, 11980. The address for the above Suffolk County District Attorney employees is Suffolk County District Attorney's Office – William J. Lindsay County Complex – Building 77, Veterans Memorial Highway, Hauppauge, NY 11788.

3. The County Defendants may also offer the relevant admissible testimony of any other individual identified in police paperwork, previously furnished during discovery. Said individuals will testify as to their observations, their involvement in the incidents as alleged by the Named Plaintiffs or other class members, conversations had with the Named Plaintiffs or other class members and/or others, and their involvement in the investigation of the Named Plaintiffs' or other class members allegations.¹⁶

identifying Assistant District Attorney Joseph Carroll and Assistant District Attorney Melisa Bliss as witnesses they may call at trial, as required by FRCP 26(e)(1). Additionally, the County Defendants and Suffolk County District Attorney's Office withheld in their entirety approximately 1500 pages of trial notes taken by Assistant District Attorneys during the course of the criminal trial of Scott Greene on the basis of privilege. The County Defendants' productions do not appear to contain any other document belonging to these witnesses, which means they withheld from production all written discovery from these witnesses on the basis of privilege.

¹⁶ Named Plaintiffs object to the County Defendants calling any witnesses not disclosed by name, either in their case in chief or for impeachment or rebuttal purposes. FRCP 26(a)(1)(A) states that a "a party must...provide to the other parties: (i) the name...of each individual likely to

4. The County Defendants further reserve their right to use such additional and unidentified witnesses for impeachment purposes and/or as may be warranted in response to the plaintiffs' direct case as the need arises. See FRCP Rule 26(d)(3).¹⁷

X. DESIGNATIONS OF DEPOSITION TESTIMONY

1. The Parties hereby submit a list of deposition designations, objections, and counter-designations to the Court.

2. Named Plaintiffs' deposition designations are annexed hereto as Exhibit A.¹⁸

3. The County Defendants reserve the right to use deposition testimony if the witness

have discoverable information...that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment." Additionally, FRCP 26(e)(1) requires the County Defendants to supplement their previous disclosures under FRCP 26(a). Moreover, Judge Kuntz's Individual Motion Practices and Rules Section V.A.8 requires that the joint pre-trial order "shall include...[a] list of the names and addresses of all witnesses, including expert witnesses and possible witnesses who will be called only for impeachment or rebuttal purposes and so designated, together with a brief statement of the expected testimony of each witness. Only listed witnesses will be permitted to testify except where prompt notice has been given and good cause shown." (emphasis added).

¹⁷ Named Plaintiffs object to the County Defendants calling any witnesses not disclosed by name, either in their case in chief or for impeachment or rebuttal purposes. FRCP 26(a)(1)(A) states that a "a party must...provide to the other parties: (i) the name...of each individual likely to have discoverable information...that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment." Additionally, FRCP 26(e)(1) requires the County Defendants to supplement their previous disclosures under FRCP 26(a). Moreover, Judge Kuntz's Individual Motion Practices and Rules Section V.A.8 requires that the joint pre-trial order "shall include...[a] list of the names and addresses of all witnesses, including expert witnesses and possible witnesses who will be called only for impeachment or rebuttal purposes and so designated, together with a brief statement of the expected testimony of each witness. Only listed witnesses will be permitted to testify except where prompt notice has been given and good cause shown." (emphasis added).

¹⁸ County Defendants object to all deposition designations proposed by the Named Plaintiffs to the extent that the witnesses are available to testify and can appear in person on the grounds of hearsay and bolstering, but do not object for the purposes of impeachment or to refresh the recollection of the witnesses.

is unavailable and for the purpose of impeachment.¹⁹

4. The Parties reserve and do not waive all other rights and objections regarding the above, including without limitation the right to supplement and amend upon a showing of good cause, their proposed deposition designations. The Parties further reserve the right to use deposition testimony in accordance with the Federal Rules of Evidence and Federal Rules of Civil Procedure.

XI. TRIAL EXHIBITS

1. The Parties each hereby submit their schedules of trial exhibits to the Court.
2. The exhibits that Named Plaintiffs intend to offer are listed in the spreadsheet annexed hereto as Exhibit B-1.²⁰
3. The County Defendants reserve their right to offer into evidence any and all relevant and admissible exhibits, and all portions thereof, previously identified by the plaintiffs, whether or not the plaintiffs actually offer such exhibits. (Said exhibits are hereby incorporated by reference.) The County Defendants may also offer the additional exhibits listed in the spreadsheet annexed hereto as Exhibit B-2.

¹⁹ Named Plaintiffs object to the County Defendants' reservation of the right "to use deposition testimony if the witness is unavailable" in their case in chief, without providing their proposed designations, so that Named Plaintiffs may have the opportunity to object and counter-designate any such testimony, as is contemplated by Judge Kuntz's Individual Motion Practices and Rules Section V.A.9. (requiring that the joint pre-trial order "shall include...[a] designation by each party for deposition testimony to be offered in its case in chief, with any cross-designations and objections by any other party"). Named Plaintiffs reserve the right to object to the introduction of any deposition testimony at trial if a witness is unavailable if such testimony has not been previously designated according to the Court's rules and ordered schedule.

²⁰ Named Plaintiffs reserve their right to offer into evidence any exhibits identified by any Defendants. (Said exhibits are hereby incorporated by reference.)

4. In each Party's list, objections are noted and the grounds for such objections have been specified.

5. The Parties have not included in their trial exhibit lists: (1) demonstrative exhibits; (2) summary evidence presented pursuant to Federal Rule of Evidence 1006; (3) documents used solely as a basis for demonstrative exhibits or summary evidence; and (4) documents relied on by an expert that a Party does not intend to introduce into evidence.

6. The Parties reserve and do not waive all other rights and objections regarding the above, including without limitation the right to supplement and amend upon a showing of good cause, their list of trial exhibits.

7. Any demonstrative exhibit, summary evidence presented pursuant to Federal Rule of Evidence 1006, or visual aid to be used at trial shall be provided to all other parties by 11:59 p.m. EDT two days prior to the exhibit's first expected use. The Parties reserve the right to object to any demonstrative exhibit, summary evidence presented pursuant to Federal Rule of Evidence 1006, or visual aid.

XII. CONFIDENTIALITY

1. Consistent with the Stipulated Second Amended Protective Order dated November 19, 2019, the Named Plaintiffs request to be identified only by pseudonym.²¹ Named Plaintiffs intend to bring a motion outlining the proposed procedures governing confidentiality.

²¹ County Defendants object to the confidential nature of the Named Plaintiffs' identities continuing during the trial.

XIII. AMENDMENT OF THE PRETRIAL ORDER

1. This Order may be amended upon application to the Court by any party for good cause shown, or by agreement of the Parties with approval of the Court.

Dated: April 29, 2022

Respectfully submitted,

/s/ Jose Perez

Jose Perez
Jackson Chin
Ghita Schwarz
Nathalia Alejandra Varela
Andrew Claude Case
Fulvia Vargas-De Leon
LATINOJUSTICE PRLDEF
475 Riverside Drive, Suite 1901
New York, NY 10115
(212) 219-3360
jperez@latinojustice.org
jchin@latinojustice.org
gschwarz@latinojustice.org
nvarela@latinojustice.org
acase@latinojustice.org
fvargasdeleon@latinojustice.org

/s/ Brian C. Mitchell

Brian C. Mitchell
Christiana Stover McSloy
Dana L. Kobos
SUFFOLK COUNTY ATTORNEY'S OFFICE
H. Lee Dennison Building
100 Veteran Memorial Highway
P.O. Box 6100
Hauppauge, NY 11788
Telephone: (631) 853-5834
Brian.Mitchell@suffolkcountyny.gov
Christiana.McSloy@suffolkcountyny.gov
Dana.Kobos@suffolkcountyny.gov

Counsel for County Defendants

/s/ Atara Miller

Scott A. Edelman
Atara Miller
Katherine K. Fell
Samantha A. Lovin
Griselda Cabrera
MILBANK LLP
55 Hudson Yards
New York, NY 10001-2163
Telephone: (212) 530-5000
sedelman@milbank.com
amiller@milbank.com
kfell@milbank.com
slovin@milbank.com
gcabrera@milbank.com

David Marcou
MILBANK LLP
1850 K Street, NW, Suite 1100
Washington, D.C. 20006
Telephone: (202) 835-7516
dmarcou@milbank.com

Counsel for Plaintiffs #1-21

SO ORDERED.

S/ WFK

HON. WILLIAM F. KUNTZ, II
UNITED STATES DISTRICT JUDGE

Dated: May 17, 2022
Brooklyn, New York

Exhibit A

Plaintiffs #1-21's

Deposition Designations

Plaintiffs #1-21 v. Suffolk County, et al.
Deposition Designations

Gregory Anderson

Deposition taken August 25, 2020

Plaintiffs' Affirmative Designations

28:19 – 29:14	81:19 – 81:19	166:23 – 168:4	249:25 – 250:11
29:17 – 29:18	82:23 – 82:25	169:24 – 170:13	250:14 – 250:17
32:9 – 32:17	83:4 – 83:8	174:2 – 174:6	250:20 – 250:24
34:21 – 35:9	83:18 – 83:21	174:8 – 174:15	251:10 – 251:25
35:22 – 35:25	83:24 – 83:24	174:18 – 175:17	252:8 – 253:19
38:13 – 38:21	84:3 – 84:10	175:20 – 176:6	253:22 – 254:11
41:10 – 41:25	84:14 – 84:17	176:9 – 176:12	254:14 – 256:5
42:11 – 42:14	86:11 – 86:19	176:15 – 176:19	258:11 – 258:19
46:19 – 47:5	87:3 – 88:5	176:22 – 178:5	258:22 – 259:8
50:10 – 50:24	89:3 – 89:10	188:20 – 189:12	259:11 – 259:15
51:11 – 52:7	90:4 – 90:16	189:15 – 189:20	259:19 – 260:5
52:17 – 53:2	91:6 – 91:9	190:14 – 190:20	260:8 – 260:8
53:5 – 53:16	91:11 – 91:11	190:25 – 191:9	260:12 – 260:17
53:19 – 54:15	91:14 – 94:5	192:9 – 192:21	260:21 – 260:21
55:4 – 55:20	96:25 – 97:8	195:22 – 196:15	261:7 – 262:4
60:7 – 60:15	97:11 – 97:13	199:14 – 199:25	262:8 – 262:11
60:19 – 62:16	97:20 – 98:15	200:23 – 201:19	263:5 – 263:7
63:8 – 64:8	100:17 – 101:24	202:3 – 202:6	263:11 – 263:25
64:11 – 64:24	102:7 – 102:24	203:5 – 203:8	264:3 – 264:10
69:2 – 70:6	103:4 – 103:13	212:15 – 212:19	264:17 – 264:20
74:5 – 74:8	153:7 – 153:10	212:22 – 213:3	264:23 – 265:14
74:15 – 75:4	153:25 – 154:10	216:24 – 217:5	265:17 – 265:17
75:14 – 75:19	154:13 – 154:18	217:16 – 217:24	265:21 – 266:3
75:22 – 75:25	154:21 – 154:24	218:2 – 218:12	266:6 – 266:15
77:11 – 77:15	155:3 – 155:8	218:24 – 220:11	266:18 – 266:19
77:18 – 78:8	157:14 – 157:21	231:15 – 231:20	267:9 – 267:14
78:20 – 78:23	157:24 – 158:12	232:2 – 234:12	267:17 – 267:18
79:2 – 79:12	158:15 – 158:21	248:5 – 249:2	281:3 – 281:12
79:15 – 79:15	159:15 – 159:22	249:11 – 249:14	284:23 – 285:8
81:9 – 81:15	166:5 – 166:20	249:17 – 249:22	

Defendants' Objections the Plaintiffs' Affirmative Designations

None, other than as reflected in the Proposed Joint Pre-Trial Order submitted herewith.

Defendants' Counter-Designations to Plaintiffs' Affirmative Designations

None.

Plaintiffs' Objections to Defendants' Counter-Designations

None.

Plaintiffs #1-21 v. Suffolk County, et al.
Deposition Designations

James Burke

Deposition taken January 27, 2020

Plaintiffs' Affirmative Designations

5:7 – 5:10	67:5 – 68:24	135:11 – 135:24
10:15 – 16:2	74:23 – 74:24	136:10 – 136:24
17:12 – 17:18	75:3 – 75:4	147:5 – 147:20
19:15 – 20:11	83:21 – 84:7	154:21 – 156:24
22:21 – 22:24	90:14 – 90:24	205:13 – 205:18
30:8 – 30:25	91:6 – 91:9	209:8 – 209:13
31:12 – 32:15	95:5 – 95:21	210:15 – 211:4
37:16 – 37:17	110:25 – 111:24	211:6 – 211:6
52:21 – 52:14	114:15 – 115:11	215:5 – 215:10
53:4 – 54:15	117:15 – 117:23	216:11 – 216:15
63:12 – 63:22	124:3 – 125:14	216:19 – 218:5
64:8 – 65:5	130:18 – 132:3	

Defendants' Objections the Plaintiffs' Affirmative Designations

None, other than as reflected in the Proposed Joint Pre-Trial Order submitted herewith.

Defendants' Counter-Designations to Plaintiffs' Affirmative Designations

None.

Plaintiffs' Objections to Defendants' Counter-Designations

None.

Plaintiffs #1-21 v. Suffolk County, et al.
Deposition Designations

Michael Caldarelli

Deposition taken December 21, 2017

Plaintiffs' Affirmative Designations

5:9 – 5:14	121:6 – 121:13	196:21 – 198:6	262:13 – 264:7
47:6 – 48:2	121:24 – 123:6	199:4 – 200:13	266:11 – 267:5
48:19 – 49:15	138:23 – 140:10	203:22 – 204:17	268:3 – 269:3
51:9 – 51:23	141:3 – 141:7	204:22 – 205:7	270:20 – 271:8
53:11 – 53:19	145:22 – 148:8	205:19 – 207:16	274:10 – 274:15
58:8 – 60:23	150:14 – 157:7	208:6 – 208:11	274:23 – 275:21
62:6 – 63:8	160:22 – 161:11	208:25 – 210:2	276:6 – 276:14
64:24 – 68:8	161:16 – 163:6	210:8 – 210:13	278:17 – 281:11
69:9 – 69:12	164:12 – 166:3	211:5 – 211:9	281:24 – 282:14
70:10 – 72:2	169:16 – 170:8	211:16 – 211:19	282:24 – 283:8
73:20 – 78:14	171:9 – 171:16	212:2 – 212:17	285:3 – 293:19
79:8 – 80:6	174:17 – 175:14	218:20 – 219:8	299:9 – 300:11
80:14 – 82:6	176:17 – 177:19	223:11 – 224:14	306:11 – 307:21
83:8 – 84:7	177:22 – 178:8	226:17 – 226:22	310:11 – 311:11
91:15 – 92:13	178:15 – 178:19	227:14 – 227:22	312:20 – 312:24
93:20 – 94:24	178:24 – 180:7	228:10 – 229:11	313:8 – 313:16
97:21 – 99:6	180:15 – 181:4	238:23 – 239:7	320:5 – 320:24
101:8 – 102:3	182:14 – 183:6	239:22 – 241:10	322:21 – 323:8
107:20 – 108:5	188:17 – 189:3	242:11 – 244:24	324:6 – 324:16
116:22 – 117:13	189:13 – 189:17	253:2 – 253:13	332:20 – 334:15
117:25 – 118:14	189:25 – 190:5	254:15 – 256:14	335:9 – 337:7
118:25 – 120:20	190:12 – 191:7	257:22 – 258:2	

Defendants' Objections the Plaintiffs' Affirmative Designations

None, other than as reflected in the Proposed Joint Pre-Trial Order submitted herewith.

Defendants' Counter-Designations to Plaintiffs' Affirmative Designations

None.

Plaintiffs' Objections to Defendants' Counter-Designations

None.

Plaintiffs #1-21 v. Suffolk County, et al.
Deposition Designations

Christopher Corsino

Deposition taken November 3, 2017

Plaintiffs' Affirmative Designations

6:2 – 6:13	70:7 – 71:2
9:4 – 10:9	71:13 – 72:17
11:6 – 12:3	72:22 – 73:5
14:13 – 19:13	75:3 – 79:10
24:15 – 25:20	80:8 – 81:2
27:11 – 27:21	81:14 – 83:9
29:7 – 29:19	86:12 – 88:10
30:8 – 35:3	88:16 – 89:7
35:22 – 36:25	90:3 – 91:21
37:19 – 38:9	94:13 – 97:2
38:22 – 39:3	97:20 – 98:22
39:23 – 40:4	99:4 – 99:19
40:12 – 43:21	99:25 – 100:21
44:11 – 44:19	104:9 – 106:5
45:2 – 46:6	110:20 – 111:22
47:4 – 47:18	114:17 – 115:17
48:7 – 50:8	119:21 – 121:5
50:19 – 51:22	121:9 – 121:25
53:5 – 57:9	123:9 – 126:16
59:7 – 61:2	127:6 – 128:2
62:17 – 63:4	128:11 – 130:20
63:9 – 67:3	132:17 – 136:20
67:7 – 69:2	137:13 – 137:19
69:8 – 69:25	

Defendants' Objections the Plaintiffs' Affirmative Designations

None, other than as reflected in the Proposed Joint Pre-Trial Order submitted herewith.

Defendants' Counter-Designations to Plaintiffs' Affirmative Designations

None.

Plaintiffs' Objections to Defendants' Counter-Designations

None.

Plaintiffs #1-21 v. Suffolk County, et al.
Deposition Designations

Bridgett Dormer

Deposition taken November 3, 2017

Plaintiffs' Affirmative Designations

4:7 – 4:11
4:17 – 5:14
6:16 – 7:24
8:4 – 8:7
25:11 – 26:4
26:13 – 26:16
26:22 – 26:25
27:5 – 27:6
29:24 – 30:3
46:6 – 46:16
52:19 – 52:21
53:13 – 53:24
55:18 – 58:7
74:4 – 76:6
78:24 – 79:5
83:14 – 86:7
125:15 – 126:9
127:4 – 127:11
210:4 – 211:12
211:16 – 211:22

Defendants' Objections the Plaintiffs' Affirmative Designations

None, other than as reflected in the Proposed Joint Pre-Trial Order submitted herewith.

Defendants' Counter-Designations to Plaintiffs' Affirmative Designations

None.

Plaintiffs' Objections to Defendants' Counter-Designations

None.

Plaintiffs #1-21 v. Suffolk County, et al.
Deposition Designations

Scott Greene

Deposition taken October 11, 2019

Plaintiffs' Affirmative Designations

5:10 – 5:15	60:16 – 61:8
6:2 – 6:5	62:10 – 62:12
12:7 – 13:5	65:19 – 65:23
13:17 – 14:4	68:4 – 68:14
15:24 – 16:21	68:18 – 68:20
17:12 – 18:17	68:22 – 69:8
19:6 – 19:17	77:21 – 82:17
29:18 – 30:8	82:20 – 83:14
30:16 – 30:19	84:13 – 85:20
31:4 – 32:7	86:11 – 86:16
32:11 – 32:24	86:18 – 87:12
33:20 – 34:24	87:23 – 88:9
38:2 – 39:10	88:12 – 90:24
39:15 – 41:7	91:2 – 92:4
42:17 – 45:6	92:13 – 93:14
45:10 – 47:8	93:18 – 94:12
47:18 – 48:16	94:14 – 95:5
49:13 – 49:23	95:7 – 95:16
50:25 – 51:10	95:20 – 98:6
51:22 – 52:13	99:11 – 100:10
56:9 – 57:15	101:2 – 102:18
58:8 – 58:19	103:4 – 103:24
59:9 – 59:9	104:3 – 105:12
59:11 – 60:2	106:12 – 107:14

Defendants' Objections the Plaintiffs' Affirmative Designations

None, other than as reflected in the Proposed Joint Pre-Trial Order submitted herewith.

Defendants' Counter-Designations to Plaintiffs' Affirmative Designations

None.

Plaintiffs' Objections to Defendants' Counter-Designations

None.

Plaintiffs #1-21 v. Suffolk County, et al.
Deposition Designations

Scott Greene

Deposition taken December 9, 2019

Plaintiffs' Affirmative Designations

116:11 – 116:16	155:22 – 155:25	211:15 – 215:9	264:9 – 264:11
119:4 – 121:4	156:3 – 158:22	215:11 – 215:15	264:13 – 264:16
123:9 – 125:21	158:24 – 158:24	216:3 – 216:6	264:21 – 265:4
125:23 – 129:9	159:2 – 159:14	216:8 – 216:22	265:6 – 265:10
129:11 – 129:16	159:16 – 159:20	217:11 – 226:22	265:17 – 265:20
130:4 – 130:18	159:22 – 160:10	227:13 – 228:8	266:4 – 266:15
134:22 – 135:9	160:20 – 163:22	228:11 – 228:21	266:17 – 266:17
135:16 – 137:7	163:24 – 164:18	228:23 – 229:9	266:23 – 267:12
137:20 – 138:9	164:20 – 165:18	229:12 – 229:13	267:14 – 267:23
138:24 – 139:3	165:20 – 167:14	229:15 – 229:22	267:25 – 268:3
139:11 – 139:21	167:20 – 168:10	229:24 – 230:16	268:8 – 268:17
139:24 – 140:24	168:12 – 169:2	231:9 – 232:8	268:19 – 268:24
141:2 – 141:4	169:15 – 170:8	232:10 – 233:16	269:2 – 269:5
141:7 – 141:7	170:18 – 171:3	233:24 – 234:13	269:7 – 269:7
141:14 – 141:20	171:6 – 171:9	234:17 – 234:21	269:13 – 269:19
141:22 – 141:24	171:13 – 172:7	234:24 – 235:23	270:9 – 270:11
142:3 – 142:10	172:9 – 172:11	236:16 – 238:24	270:14 – 270:16
142:12 – 142:14	172:15 – 172:19	239:9 – 245:4	270:22 – 270:24
142:18 – 142:21	172:23 – 173:19	245:6 – 245:9	271:3 – 271:6
142:23 – 143:6	174:2 – 180:15	245:11 – 247:17	271:9 – 271:12
143:8 – 143:8	180:18 – 185:11	248:5 – 249:16	271:15 – 271:15
143:18 – 143:21	185:19 – 187:6	249:20 – 251:7	272:21 – 272:24
143:23 – 144:16	187:10 – 187:16	251:11 – 251:11	273:3 – 273:12
144:18 – 145:13	187:20 – 187:20	251:19 – 251:23	273:19 – 273:21
145:15 – 146:14	189:14 – 190:7	252:2 – 252:16	274:4 – 274:24
146:16 – 146:20	190:10 – 193:13	252:19 – 253:16	275:8 – 275:10
146:22 – 147:2	193:15 – 194:25	253:19 – 254:25	275:12 – 275:21
147:4 – 147:8	195:3 – 196:19	255:3 – 255:7	276:4 – 276:7
147:10 – 147:15	196:22 – 196:22	255:10 – 256:4	277:18 – 277:20
147:17 – 147:21	203:11 – 204:6	256:6 – 256:11	277:24 – 278:20
147:23 – 148:3	204:8 – 204:8	256:14 – 256:24	280:5 – 281:17
148:5 – 149:18	206:21 – 206:23	257:8 – 257:25	281:19 – 282:24
149:24 – 149:25	207:8 – 207:11	258:5 – 259:14	283:2 – 283:6
150:3 – 150:25	207:13 – 209:19	259:16 – 262:18	283:13 – 283:20
151:3 – 152:12	209:21 – 210:2	263:7 – 263:9	283:23 – 284:2
153:2 – 154:6	210:5 – 210:6	263:11 – 263:13	284:5 – 284:5
154:8 – 154:19	210:13 – 210:15	263:15 – 263:22	286:7 – 286:9
155:2 – 155:17	210:17 – 211:13	264:5 – 264:7	286:14 – 286:18

286:22 – 287:3	293:16 – 293:17	297:21 – 298:5	303:17 – 303:25
287:7 – 287:18	293:19 – 294:4	298:9 – 298:13	304:3 – 304:16
287:22 – 287:22	294:6 – 294:6	298:15 – 298:20	304:25 – 308:5
288:18 – 289:17	294:18 – 295:9	298:22 – 299:19	308:7 – 308:18
290:18 – 290:25	296:4 – 296:12	300:20 – 300:25	308:21 – 310:22
291:14 – 291:20	296:16 – 296:21	301:3 – 302:6	311:16 – 313:20
291:22 – 291:22	296:23 – 296:24	302:8 – 302:14	314:5 – 314:16
292:11 – 292:24	297:7 – 297:11	302:20 – 303:15	314:21 – 316:12

Defendants' Objections the Plaintiffs' Affirmative Designations

None, other than as reflected in the Proposed Joint Pre-Trial Order submitted herewith.

Defendants' Counter-Designations to Plaintiffs' Affirmative Designations

None.

Plaintiffs' Objections to Defendants' Counter-Designations

None.

Plaintiffs #1-21 v. Suffolk County, et al.
Deposition Designations

Robert Lehmann

Deposition taken November 6, 2017

Plaintiffs' Affirmative Designations

8:8 – 8:14	117:23 – 120:5	197:21 – 200:2
9:15 – 10:24	120:18 – 120:25	200:11 – 200:20
21:15 – 21:21	121:2 – 122:8	204:4 – 210:19
25:17 – 26:20	122:12 – 123:8	215:15 – 217:22
33:18 – 33:22	124:10 – 124:25	228:8 – 229:21
49:2 – 49:6	125:3 – 126:13	234:11 – 238:6
55:25 – 56:11	139:20 – 145:24	239:3 – 240:2
64:19 – 65:11	147:6 – 151:4	258:3 – 258:7
66:9 – 66:18	151:13 – 152:16	258:12 – 259:13
76:2 – 76:5	154:7 – 156:2	265:15 – 265:23
76:11 – 77:7	156:4 – 157:9	266:5 – 266:18
77:17 – 78:22	157:17 – 159:8	270:25 – 271:18
79:14 – 80:4	159:24 – 161:8	272:2 – 272:19
80:17 – 81:6	166:13 – 167:14	273:9 – 275:9
89:15 – 91:15	168:6 – 169:15	277:20 – 278:6
91:17 – 92:4	169:17 – 172:21	355:10 – 355:24
97:22 – 98:15	182:17 – 194:25	358:21 – 358:25
110:15 – 111:15	195:3 – 197:2	376:14 – 376:24

Defendants' Objections the Plaintiffs' Affirmative Designations

None, other than as reflected in the Proposed Joint Pre-Trial Order submitted herewith.

Defendants' Counter-Designations to Plaintiffs' Affirmative Designations

None.

Plaintiffs' Objections to Defendants' Counter-Designations

None.

Plaintiffs #1-21 v. Suffolk County, et al.
Deposition Designations

Christopher Love

Deposition taken September 24, 2019

Plaintiffs' Affirmative Designations

5:7 – 5:10	136:22 – 137:24	217:13 – 218:7	309:6 – 310:11
13:15 – 14:2	138:3 – 138:7	218:14 – 218:25	310:24 – 312:7
18:19 – 19:24	138:9 – 138:11	219:4 – 220:7	313:9 – 315:4
28:6 – 36:19	138:13 – 138:22	220:13 – 220:19	317:23 – 320:6
36:22 – 37:22	139:2 – 139:4	226:3 – 226:20	320:9 – 322:14
40:16 – 42:4	139:6 – 139:15	226:23 – 227:11	323:11 – 324:4
53:5 – 53:25	139:17 – 140:9	227:14 – 227:21	326:10 – 327:8
54:10 – 54:22	141:7 – 143:4	229:9 – 231:4	327:19 – 329:25
56:5 – 58:10	143:20 – 144:5	231:7 – 231:21	331:2 – 333:20
58:25 – 61:13	144:7 – 148:25	231:24 – 234:12	334:6 – 335:15
63:4 – 66:21	149:9 – 150:24	237:9 – 237:20	337:17 – 338:2
68:14 – 69:4	152:13 – 158:12	238:6 – 238:12	338:5 – 340:7
69:15 – 78:25	159:15 – 161:16	244:9 – 245:6	340:14 – 341:14
80:19 – 81:7	162:22 – 162:23	247:8 – 251:10	341:24 – 342:11
81:24 – 82:21	163:2 – 166:20	257:25 – 258:15	342:14 – 342:15
84:15 – 85:10	167:4 – 182:25	260:11 – 261:6	342:21 – 343:4
86:3 – 87:24	183:4 – 183:5	262:7 – 263:10	343:7 – 343:23
88:3 – 88:10	183:8 – 188:2	265:20 – 265:22	344:2 – 344:7
88:17 – 89:16	188:14 – 188:21	265:25 – 266:3	344:10 – 345:16
90:9 – 90:15	189:3 – 190:13	266:6 – 266:10	345:19 – 346:2
91:2 – 91:21	190:17 – 191:11	266:13 – 266:21	346:5 – 346:14
92:11 – 92:23	191:22 – 192:3	266:24 – 267:8	346:17 – 346:21
93:13 – 93:18	192:22 – 193:8	269:12 – 270:4	346:24 – 347:5
93:24 – 95:2	193:11 – 193:18	271:6 – 272:9	347:8 – 347:14
96:20 – 97:22	193:23 – 194:6	272:12 – 272:16	347:17 – 347:18
98:11 – 98:23	194:8 – 194:8	272:19 – 272:20	350:5 – 350:19
99:2 – 102:8	194:11 – 194:11	275:2 – 275:21	350:22 – 351:9
103:10 – 109:23	194:15 – 195:18	276:21 – 278:24	354:16 – 355:18
110:2 – 112:15	195:21 – 195:23	285:2 – 285:4	357:5 – 357:7
115:11 – 116:3	196:2 – 196:18	285:7 – 285:25	358:3 – 358:10
116:20 – 119:18	196:21 – 197:5	286:4 – 286:12	360:7 – 362:19
120:19 – 124:24	197:8 – 197:25	286:15 – 287:7	365:22 – 367:9
125:3 – 130:8	198:6 – 198:23	287:10 – 293:2	367:19 – 368:12
130:11 – 130:15	200:3 – 200:20	293:5 – 297:8	
131:10 – 131:14	201:2 – 208:13	297:11 – 298:3	
131:18 – 134:24	210:15 – 211:12	298:6 – 298:9	
135:7 – 135:25	211:24 – 214:22	299:7 – 299:15	
136:2 – 136:14	216:16 – 217:4	299:18 – 299:20	

Defendants' Objections the Plaintiffs' Affirmative Designations

None, other than as reflected in the Proposed Joint Pre-Trial Order submitted herewith.

Defendants' Counter-Designations to Plaintiffs' Affirmative Designations

None.

Plaintiffs' Objections to Defendants' Counter-Designations

None.

Plaintiffs #1-21 v. Suffolk County, et al.
Deposition Designations

Christopher Love

Deposition taken December 10, 2019

Plaintiffs' Affirmative Designations

399:8 – 400:14	509:4 – 509:23	622:21 – 623:23	683:17 – 685:5
402:21 – 404:13	511:19 – 515:15	625:21 – 628:6	685:19 – 686:4
404:22 – 406:4	515:25 – 517:14	629:5 – 629:14	690:12 – 693:10
423:16 – 424:6	518:16 – 518:19	631:14 – 635:18	693:21 – 696:25
424:12 – 424:17	518:22 – 521:4	635:21 – 638:12	697:7 – 698:13
425:25 – 427:4	527:4 – 528:7	639:13 – 639:21	698:16 – 700:6
427:23 – 428:8	529:23 – 532:16	639:24 – 642:13	700:25 – 701:23
458:8 – 458:10	546:9 – 546:18	642:16 – 642:18	702:6 – 702:12
458:13 – 458:15	567:22 – 568:3	644:3 – 644:12	706:3 – 707:2
458:18 – 459:12	569:14 – 570:7	644:18 – 645:14	707:5 – 707:18
469:5 – 473:2	572:7 – 572:25	645:22 – 645:24	708:3 – 709:11
475:9 – 476:15	579:3 – 581:6	648:21 – 652:4	709:14 – 713:15
476:24 – 478:9	586:9 – 589:4	652:13 – 652:16	713:18 – 714:6
480:2 – 482:20	589:7 – 593:5	652:23 – 653:4	715:5 – 717:15
483:14 – 484:4	594:22 – 596:3	654:10 – 654:21	717:18 – 718:20
484:7 – 487:23	597:20 – 599:2	656:25 – 658:2	719:5 – 721:19
488:2 – 489:24	600:8 – 600:13	658:10 – 659:6	722:20 – 724:4
491:7 – 491:11	600:21 – 601:23	659:9 – 659:23	724:12 – 727:12
491:14 – 492:25	602:3 – 604:17	660:2 – 660:7	729:17 – 730:3
493:2 – 494:24	605:2 – 605:9	660:10 – 660:16	730:6 – 731:23
495:10 – 496:11	605:19 – 606:11	662:13 – 667:13	736:8 – 737:6
496:14 – 497:20	606:14 – 608:19	667:16 – 668:9	738:7 – 738:18
503:9 – 503:14	612:12 – 614:6	668:12 – 669:2	
503:17 – 504:4	619:2 – 620:22	669:5 – 669:8	
505:4 – 508:4	622:7 – 622:18	677:22 – 682:3	

Defendants' Objections the Plaintiffs' Affirmative Designations

None, other than as reflected in the Proposed Joint Pre-Trial Order submitted herewith.

Defendants' Counter-Designations to Plaintiffs' Affirmative Designations

None.

Plaintiffs' Objections to Defendants' Counter-Designations

None.

Plaintiffs #1-21 v. Suffolk County, et al.
Deposition Designations

JoAnn McLaughlin

Deposition taken August 20, 2019

Plaintiffs' Affirmative Designations

15:11 – 16:21	89:19 – 89:23	147:13 – 148:7	211:2 – 211:13
17:9 – 18:9	90:2 – 90:22	148:14 – 148:18	211:19 – 215:7
18:20 – 19:10	93:7 – 93:14	148:25 – 151:6	215:23 – 215:25
24:9 – 25:2	93:17 – 93:25	151:19 – 153:22	216:8 – 216:24
25:5 – 25:6	94:4 – 94:9	154:8 – 157:25	217:4 – 219:17
25:10 – 25:25	94:19 – 94:24	158:15 – 160:3	219:20 – 220:5
26:8 – 26:23	95:3 – 95:6	160:21 – 160:25	225:21 – 225:25
27:2 – 29:14	96:4 – 97:4	161:8 – 161:19	226:3 – 229:4
29:17 – 30:24	99:2 – 100:10	164:11 – 165:20	230:3 – 230:13
31:9 – 32:3	100:13 – 100:23	166:17 – 166:24	232:16 – 233:20
32:8 – 32:22	101:14 – 101:24	167:11 – 172:11	233:23 – 237:6
42:18 – 43:3	103:9 – 103:22	172:22 – 173:12	237:9 – 237:18
43:14 – 43:25	105:6 – 105:22	173:21 – 175:22	238:10 – 238:19
45:11 – 46:9	106:2 – 106:10	177:2 – 177:18	238:22 – 238:24
46:12 – 46:23	106:13 – 106:17	178:4 – 180:9	239:11 – 239:22
48:11 – 48:18	107:4 – 107:15	180:23 – 181:25	240:9 – 241:3
49:2 – 49:11	108:17 – 109:23	182:7 – 182:23	241:7 – 241:15
60:17 – 61:14	110:18 – 110:22	183:9 – 185:20	241:20 – 242:24
61:17 – 61:20	113:14 – 115:16	186:19 – 187:6	243:6 – 248:19
62:2 – 62:19	117:9 – 117:16	187:8 – 188:19	249:3 – 249:14
63:2 – 69:10	117:19 – 117:25	189:24 – 191:22	251:19 – 251:24
69:19 – 70:3	118:4 – 118:15	194:15 – 195:6	252:3 – 252:5
70:16 – 71:2	119:20 – 119:25	195:23 – 196:7	252:8 – 252:11
71:5 – 71:8	120:2 – 121:16	197:13 – 198:5	252:14 – 252:16
71:11 – 71:23	124:2 – 125:16	198:8 – 198:14	252:19 – 253:4
72:6 – 72:14	126:6 – 128:10	198:20 – 199:6	253:12 – 253:20
73:8 – 76:18	129:10 – 129:17	199:13 – 199:18	253:23 – 254:3
76:21 – 76:22	130:7 – 131:7	199:21 – 201:21	254:11 – 255:21
77:3 – 77:5	131:23 – 132:16	201:24 – 202:10	256:6 – 256:19
78:5 – 78:16	134:3 – 134:15	202:13 – 202:18	256:22 – 256:25
78:21 – 82:9	135:15 – 135:20	203:2 – 203:20	257:23 – 261:10
83:6 – 83:18	136:2 – 137:11	204:3 – 205:13	261:13 – 262:15
84:2 – 84:23	137:16 – 139:3	205:22 – 206:4	262:18 – 263:17
85:13 – 86:25	139:18 – 140:10	206:7 – 206:15	263:21 – 263:25
87:5 – 87:8	140:15 – 141:12	207:8 – 207:25	264:2 – 264:5
87:20 – 88:5	141:20 – 142:8	208:4 – 209:11	267:19 – 268:2
89:2 – 89:4	142:11 – 142:11	209:14 – 209:21	269:5 – 269:17
89:7 – 89:13	144:24 – 146:8	209:24 – 210:3	269:20 – 270:25

271:4 – 271:7	281:11 – 281:24	286:9 – 287:2	295:11 – 295:17
271:18 – 272:13	282:18 – 283:20	287:5 – 287:7	295:20 – 296:21
272:15 – 276:4	283:23 – 284:6	287:14 – 288:8	296:24 – 297:25
278:9 – 278:23	284:8 – 284:25	289:11 – 290:17	298:18 – 299:8
279:3 279:15	285:2 – 285:23	291:2 – 291:5	300:17 – 300:20
280:2 – 280:18	286:3 – 286:6	292:8 – 295:3	300:23 – 301:2

Defendants' Objections the Plaintiffs' Affirmative Designations

None, other than as reflected in the Proposed Joint Pre-Trial Order submitted herewith.

Defendants' Counter-Designations to Plaintiffs' Affirmative Designations

None.

Plaintiffs' Objections to Defendants' Counter-Designations

None.

Plaintiffs #1 – 21 v. Suffolk County, et al.
Deposition Designations

John Meehan

Deposition taken August 13, 2019

Plaintiffs' Affirmative Designations

6:10 – 6:15	76:16 – 77:6	112:21 – 113:3	148:25 – 149:9
6:19 – 6:22	77:9 – 77:10	113:6 – 113:9	149:12 – 149:20
27:25 – 29:11	77:13 – 79:3	113:12 – 113:18	149:23 – 150:3
32:8 – 33:16	79:6 – 80:12	113:21 – 113:22	150:6 – 150:10
36:12 – 37:2	80:15 – 80:18	119:9 – 120:2	150:13 – 151:2
39:2 – 40:16	80:21 – 80:23	124:11 – 124:16	151:5 – 152:4
41:8 – 41:11	80:25 – 81:17	124:23 – 125:5	152:7 – 152:12
41:14 – 42:5	81:20 – 83:11	125:8 – 125:23	154:2 – 155:16
47:18 – 49:21	83:14 – 84:7	126:2 – 126:8	155:19 – 156:2
49:24 – 49:24	84:10 – 85:7	126:11 – 126:17	156:5 – 157:6
51:2 – 51:4	85:22 – 85:25	126:20 – 127:3	157:9 – 157:16
51:7 – 51:7	86:4 – 88:12	127:6 – 128:2	158:5 – 161:15
53:2 – 54:11	88:15 – 89:3	128:11 – 129:2	161:20 – 164:3
55:3 – 55:7	89:6 – 90:3	129:5 – 129:15	164:6 – 164:22
55:13 – 55:23	90:23 – 90:25	129:18 – 131:4	164:25 – 164:25
55:25 – 56:8	91:4 – 91:9	131:7 – 131:14	165:2 – 165:4
56:11 – 56:19	91:12 – 91:21	131:17 – 132:2	165:7 – 165:17
56:22 – 56:22	91:23 – 92:8	132:6 – 133:21	165:20 – 166:19
58:2 – 59:2	92:11 – 92:15	133:24 – 134:4	166:22 – 166:22
60:3 – 60:24	92:18 – 93:3	134:7 – 134:11	169:4 – 169:5
61:3 – 61:13	93:6 – 93:20	135:4 – 135:14	169:8 – 169:14
61:16 – 62:3	93:25 – 96:14	135:17 – 135:18	169:17 – 169:23
62:17 – 63:11	100:21 – 100:24	135:21 – 136:3	170:2 – 170:4
63:18 – 66:3	101:2 – 101:12	136:6 – 136:19	170:7 – 173:13
66:6 – 66:11	101:15 – 102:5	136:22 – 137:4	173:17 – 175:12
66:21 – 66:24	102:9 – 102:13	137:7 – 137:15	175:15 – 176:11
67:3 – 67:7	102:16 – 102:17	137:18 – 137:20	176:14 – 178:15
67:10 – 67:14	103:19 – 103:20	137:23 – 138:8	178:20 – 179:8
68:3 – 68:7	103:23 – 103:23	138:16 – 138:23	179:11 – 180:4
68:10 – 69:2	105:4 – 105:9	139:11 – 141:15	180:9 – 183:5
69:5 – 69:15	105:12 – 108:6	141:18 – 141:22	183:8 – 184:22
69:18 – 70:2	108:9 – 108:13	141:25 – 142:6	185:10 – 186:21
72:19 – 72:24	108:16 – 108:19	142:9 – 142:12	186:24 – 188:7
73:3 – 73:5	108:22 – 109:25	142:22 – 142:24	188:10 – 188:21
73:8 – 73:16	110:20 – 111:3	143:3 – 144:5	188:24 – 189:7
73:19 – 74:17	111:6 – 111:14	144:17 – 148:5	189:10 – 189:14
75:15 – 76:9	111:17 – 111:21	148:8 – 148:8	189:17 – 190:2
76:12 – 76:13	111:24 – 111:24	148:14 – 148:22	190:17 – 191:20

192:6 – 193:14	212:8 – 213:10	228:24 – 230:21	238:13 – 238:20
193:18 – 195:10	213:15 – 215:6	230:24 – 232:11	238:23 – 239:3
197:4 – 197:19	215:9 – 215:9	232:14 – 232:24	239:6 – 239:10
197:24 – 199:13	215:17 – 216:16	233:15 – 234:17	239:14 – 239:16
199:16 – 199:21	217:12 – 219:25	234:20 – 234:21	239:19 – 241:14
200:14 – 202:24	220:4 – 220:4	235:7 – 235:19	241:16 – 241:18
203:9 – 204:23	220:23 – 222:24	235:22 – 236:2	241:21 – 242:4
205:2 – 205:5	223:3 – 223:4	236:5 – 236:12	242:7 – 242:7
205:24 – 207:7	223:7 – 224:6	236:15 – 236:15	242:21 – 243:3
207:15 – 208:17	224:15 – 224:19	236:23 – 237:3	243:6 – 243:9
209:23 – 210:11	224:23 – 225:18	237:6 – 237:12	243:12 – 243:20
210:14 – 211:5	225:21 – 226:8	237:15 – 237:19	243:23 – 244:3
212:2 – 212:5	226:14 – 227:15	237:22 – 238:7	244:6 – 244:12

Defendants' Objections the Plaintiffs' Affirmative Designations

None, other than as reflected in the Proposed Joint Pre-Trial Order submitted herewith.

Defendants' Counter-Designations to Plaintiffs' Affirmative Designations

None.

Plaintiffs' Objections to Defendants' Counter-Designations

None.

Plaintiffs #1-21 v. Suffolk County, et al.
Deposition Designations

Donald Meyers

Deposition taken December 19, 2017

Plaintiffs' Affirmative Designations

5:9 – 5:12	125:12 – 126:3
13:19 – 14:5	128:10 – 129:25
14:21 – 16:20	130:12 – 132:7
40:7 – 40:19	132:19 – 134:5
50:12 – 56:25	136:6 – 137:10
63:3 – 63:19	138:2 – 145:16
64:2 – 73:25	146:14 – 147:24
74:13 – 77:4	154:8 – 157:4
81:9 – 82:17	157:6 – 157:12
83:7 – 89:8	157:14 – 163:22
90:18 – 90:21	164:8 – 165:15
91:4 – 98:17	166:2 – 167:4
107:25 – 109:14	168:21 – 172:18
113:5 – 118:6	172:22 – 173:3
123:6 – 123:14	173:7 – 178:5
124:21 – 125:3	

Defendants' Objections the Plaintiffs' Affirmative Designations

None, other than as reflected in the Proposed Joint Pre-Trial Order submitted herewith.

Defendants' Counter-Designations to Plaintiffs' Affirmative Designations

None.

Plaintiffs' Objections to Defendants' Counter-Designations

None.

Plaintiffs #1-21 v. Suffolk County, et al.
Deposition Designations

Milagros Soto

Deposition taken October 9, 2019

Plaintiffs' Affirmative Designations

4:13 – 4:18	65:22 – 65:24	162:13 – 165:25	199:24 – 202:8
11:9 – 11:18	66:3 – 66:15	166:23 – 167:15	203:3 – 204:15
11:22 – 13:7	68:12 – 68:18	168:6 – 168:18	205:3 – 206:14
13:22 – 15:20	68:21 – 68:22	168:21 – 169:11	206:17 – 206:18
16:9 – 16:19	69:25 – 70:11	169:21 – 170:10	207:22 – 208:6
17:11 – 19:18	71:2 – 71:24	170:13 – 174:6	208:9 – 208:16
20:5 – 20:23	73:4 – 74:17	176:13 – 177:8	208:25 – 209:5
21:10 – 21:22	74:20 – 75:23	177:11 – 177:17	209:8 – 209:16
23:2 – 23:18	76:2 – 76:5	181:6 – 181:8	213:19 – 213:23
23:20 – 27:14	76:8 – 76:15	181:11 – 181:24	214:2 – 215:12
28:24 – 33:19	76:18 – 78:3	182:5 – 182:21	216:10 – 217:18
35:3 – 36:13	78:6 – 78:7	183:4 – 185:18	218:8 – 218:11
36:16 – 36:16	80:10 – 82:17	186:16 – 187:23	218:14 – 219:8
38:13 – 38:21	82:20 – 83:12	188:2 – 188:14	222:17 – 222:20
41:9 – 41:15	83:23 – 84:9	188:18 – 188:24	222:23 – 222:24
41:20 – 42:6	84:17 – 84:20	192:19 – 193:7	223:6 – 223:11
42:14 – 43:4	86:4 – 86:6	193:22 – 194:3	223:15 – 223:18
45:13 – 45:19	86:9 – 88:3	194:6 – 194:6	223:21 – 224:4
46:19 – 47:15	88:16 – 88:18	194:15 – 194:17	225:5 – 225:15
47:18 – 48:12	88:21 – 88:24	194:20 – 194:25	225:18 – 225:23
49:17 – 60:13	89:3 – 91:15	196:21 – 196:23	226:2 – 226:8
62:6 – 62:21	159:24 – 160:3	197:16 – 197:19	234:8 – 235:6
63:8 – 63:10	160:6 – 160:25	197:25 – 198:23	
63:13 – 63:23	161:4 – 161:4	199:18 – 199:21	

Defendants' Objections the Plaintiffs' Affirmative Designations

None, other than as reflected in the Proposed Joint Pre-Trial Order submitted herewith.

Defendants' Counter-Designations to Plaintiffs' Affirmative Designations

None.

Plaintiffs' Objections to Defendants' Counter-Designations

None.

Plaintiffs #1-21 v. Suffolk County, et al.
Deposition Designations

Armando Valencia

Deposition taken December 20, 2017

Plaintiffs' Affirmative Designations

5:10 – 5:12
6:6 – 7:12
27:24 – 30:2
37:9 – 37:14
58:8 – 59:3
88:8 – 89:9
134:13 – 134:16
157:8 – 160:20
165:24 – 166:19
189:21 – 192:9
216:4 – 216:23
242:21 – 243:11
249:9 – 252:17
256:5 – 258:4
269:3 – 271:24
275:8 – 275:18
275:24 – 276:5
279:5 – 279:23
280:13 – 283:7
308:8 – 308:21
358:8 – 358:25
371:9 – 372:3

Defendants' Objections the Plaintiffs' Affirmative Designations

None, other than as reflected in the Proposed Joint Pre-Trial Order submitted herewith.

Defendants' Counter-Designations to Plaintiffs' Affirmative Designations

None.

Plaintiffs' Objections to Defendants' Counter-Designations

None.

Exhibit B-1

Plaintiffs #1-21's Exhibit List

Plaintiffs #1-21 v. County of Suffolk, et al.
Case No. 15-cv-2431 (E.D.N.Y.)
PLAINTIFFS' TRIAL EXHIBIT LIST

Temp. Doc. ID#	Date	Description	Bates Range	Objections
1	1/26/2010	SCPD Roadway Checkpoint Reports 2010	D-12675 - D-12961	Objection - Relevance - Not within the relevant time period of 2012 to the present
2	3/20/2010	SCPD Supplementary Report re: Sobriety Checkpoint	D-19567 - D-19567	Objection - Relevance - Not within the relevant time period of 2012 to the present
3	5/24/2010	SCPD Incident Data Report	D-14294 - D-14295	Objection - Relevance - Not within the relevant time period of 2012 to the present
4	1/4/2011	SCPD Roadway Checkpoint Reports 2011	D-12962 - D-13249	Objection - Relevance - Not within the relevant time period of 2012 to the present
5	1/5/2012	SCPD Roadway Checkpoint Reports 2012	D-13250 - D-13540	
6	7/14/2012	SCPD Roadway Checkpoint Report – July 14, 2012	D-13486 - D-13487	
7	1/7/2013	SCPD Roadway Checkpoint Reports 2013	D-13541 - D-13828	
8	1/12/2014	SCPD Roadway Checkpoint Reports 2014	D-13829 - D-14101	
9	1/16/2015	SCPD Roadway Checkpoint Reports 2015	D-14102 - D-14232	
10	2/1/2016	SCPD Roadway Checkpoint Reports 2016	D-14233 - D-14234	
11	1/1/2016	LCAC Meeting Minutes 2016	RPD_0016870 - RPD_0016884	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
12	8/16/2017	Minutes from 3rd Quarter Latino Community Advisory Committee Meeting held 8/16/17	6-20-19 Love DOJ Correspondence SC 011762 - 6-20-19 Love DOJ Correspondence SC 011767	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
13	5/18/2015	First Amended Complaint, <i>Plaintiffs #1-21 v. The County of Suffolk</i> , No. 15-CV-2431		
14	4/8/2016	Defendants' Response to Plaintiffs' First Set of Interrogatories		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
15	6/16/2016	Defendants' Supplemental Response to Plaintiffs' First Set of Interrogatories		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
16	6/17/2016	Defendants' Supplemental Response to Plaintiffs' First Set of Document Demands		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
17	12/23/2016	Defendants' Second Supplemental Response to Plaintiffs' First Set of Document Demands		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
18	8/13/2019	Plaintiff's Amended Notice of Rule 30(b)(6) Deposition of The County of Suffolk		Objection - Hearsay and relevance.
19	9/16/2019	Plaintiff's First Set of Requests for Admission to the County Defendants		Objection - Hearsay and relevance.
20	10/16/2019	Response to Request for Admissions		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
21	10/16/2019	Response to Plaintiffs' Second Set of Interrogatories		Objection - Hearsay, No objection for purposes of impeachment or to refresh recollection.
22	6/17/2020	Affidavit of Christopher A. Love		Objection - Hearsay, No objection for purposes of impeachment or to refresh recollection.
23	11/2/2016	<i>USA v. Burke</i> , 15-cr-0627, Criminal Cause for Sentencing		Objection - Hearsay, Relevance and Prejudice.
24	1/13/2016	Verdict Sheet, New York v. Greene, No. 618-2014 (N.Y. Sup. Ct.)		
25	4/15/2016	Plea Proceeding, New York v. Greene, No. 1397-2014 (N.Y. Sup. Ct.)		

Plaintiffs #1-21 v. County of Suffolk, et al.
Case No. 15-cv-2431 (E.D.N.Y.)
PLAINTIFFS' TRIAL EXHIBIT LIST

Temp. Doc. ID#	Date	Description	Bates Range	Objections
26	11/3/2017	Deposition Transcript of Christopher Corsino		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
27	11/3/2017	Deposition Transcript of Bridgett Dormer		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
28	11/6/2017	Deposition Transcript of Robert Lehmann		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
29	12/19/2017	Deposition Transcript of Donald Meyers		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
30	12/20/2017	Deposition Transcript of Armando Valencia		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
31	12/21/2017	Deposition Transcript of Michael Caldarelli		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
32	8/13/2019	Deposition Transcript of John Meehan		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
33	8/20/2019	Deposition Transcript of JoAnn McLaughlin		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
34	9/20/2019	Deposition Transcript of Vincent Cordiale		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
35	9/24/2019	Deposition Transcript of Christopher Love Vol. I		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
36	10/9/2019	Deposition Transcript of Milagros Soto		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
37	10/11/2019	Deposition Transcript of Scott Greene Vol. I		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
38	10/16/2019	Deposition Transcript of Matthew Jones		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
39	12/9/2019	Deposition Transcript of Scott Greene Vol. II		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
40	12/10/2019	Deposition Transcript of Christopher Love Vol. II		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
41	1/27/2020	Deposition Transcript of James Burke		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
42	8/25/2020	Deposition Transcript of Gregory Anderson		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
43	9/13/2011	Letter from U.S. Department of Justice to S. Levy re: Suffolk County Police Department Technical Assistance Letter	D-11451 - D-11478	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
44	3/31/2013	Email from B. Cassidy to E. Webber, J. Burke, et al. re: DOJ - Agreement requested by Fed, and attaching draft settlement agreement	11-25-2019_SelectedMessages.00000202 - 11-25-2019_SelectedMessages.00000237	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
45	6/10/2013	Draft SCPD Response to the Proposed DOJ Consent Agreement Proffered on May 30, 2013	D-11552 - D-11615	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.

Plaintiffs #1-21 v. County of Suffolk, et al. Case No. 15-cv-2431 (E.D.N.Y.) PLAINTIFFS' TRIAL EXHIBIT LIST				
Temp. Doc. ID#	Date	Description	Bates Range	Objections
46	8/30/2013	Email from G. Lolis to E. Webber, C. Love, et al. re: FW: meeting, attaching redline of draft settlement agreement	11-25-2019_SelectedMessages.00000754 - 11-25-2019_SelectedMessages.00000817	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
47	9/10/2013	Email from G. Lolis to E. Webber & M. White re: FW:, attaching redline of draft settlement agreement	11-25-2019_SelectedMessages.00001154 - 11-25-2019_SelectedMessages.00001196	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
48	1/13/2014	Agreement between the United States Department of Justice and Suffolk County Police Department	D-2261 - D-2287	
49	6/26/2015	Email from M. Goldberger to G. Lolis re: DOJ/ SCPD, attaching June 26 2015 Letter - DOJ Goldberger to SCPD Lolis and June 26 2015 - DOJ Compliance Table - SCPD Agreement	6-20-19 Love DOJ Correspondence SC 001558 - 6-20-19 Love DOJ Correspondence SC 001598	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
50	12/14/2015	Email from B. Buehler to C. Love re: USDOJ/SCPD: Compliance Status Assessment Report, attaching Compliance Assessment Report	6-20-19 Love DOJ Correspondence SC 002550 - 6-20-19 Love DOJ Correspondence SC 002620	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
51	4/18/2016	Email from M. Goldberger to C. Love re: SCPD assessment report, attaching Third Report Assessing Settlement Agreement Compliance by Suffolk County Police Department	6-20-19 Love DOJ Correspondence SC 002898 - 6-20-19 Love DOJ Correspondence SC 002927	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
52	1/19/2017	Email from J. Mondino to C. Love re: DOJ 4th Assessment Report of Suffolk County PD, attaching Fourth Report Assessing Settlement Agreement Compliance by Suffolk County Police Department	6-20-19 Love DOJ Correspondence SC 003126 - 6-20-19 Love DOJ Correspondence SC 003154	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
53	6/23/2017	Email from L. Garcia to C. Love re: SCPD Fifth Assessment Report, attaching Fifth Report Assessing Settlement Agreement Compliance by Suffolk County Police Department	6-20-19 Love DOJ Correspondence SC 003228 - 6-20-19 Love DOJ Correspondence SC 003254	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
54	3/13/2018	Sixth Report Assessing Settlement Agreement Compliance by Suffolk County Police Department	SI_Ex_075	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
55	10/11/2018	Email from C. Love to "lovelaw" re: FW: Seventh DOJ Assessment Report, attaching Seventh Report Assessing Settlement Agreement Compliance by Suffolk County Police Department	6-20-19 Love DOJ Correspondence SC 024255 - 6-20-19 Love DOJ Correspondence SC 024275	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
56	12/18/2019	Eighth Report Assessing Settlement Agreement Compliance by Suffolk County Police Department	Exhibit 70 to Plaintiffs' Opposition to Motion for Summary Judgment	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
57	11/10/2008	Letter from C. Perales to M. Kappelhoff and B. Campbell re: Fatal stabbing of Marcello Lucero	Exhibit B to Plaintiffs' Motion for Class Certification	Objection - Hearsay; Relevance.
58	11/25/2008	Letter from C. Perales to M. Kappelhoff and B. Campbell re: Complaint on behalf of Latino residents	Exhibit C to Plaintiffs' Motion for Class Certification	Objection - Hearsay; Relevance.
59	1/30/2009	Letter from M. Kappelhoff to C. Perales re: Concerns of Latino residents	Exhibit D to Plaintiffs' Motion for Class Certification	Objection - Hearsay; Relevance.
60	5/21/2009	Letter from C. Perales to S. Cutlar re: Supplement of November 25 2008 Letter	Exhibit E to Plaintiffs' Motion for Class Certification	Objection - Hearsay; Relevance.
61	7/2/2009	Letter from S. Cutlar to C. Perales re: Response to May 21, 2009 Letter	Exhibit F to Plaintiffs' Motion for Class Certification	Objection - Hearsay; Relevance.
62	11/15/2011	Letter from R. Dorner to J. Smith & M. Goldberger re: Suffolk County Police Department Technical Assistance Letter	D-11479 - D-11543	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
63	5/30/2013	Letter from M. Goldberger and J. Smith to S. Bellone re: Department of Justice Investigation of Suffolk County Police Department	11-25-2019_SelectedMessages.00000204 - 11-25-2019_SelectedMessages.00000205	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
64	1/8/2015	Internal Correspondence from A. Valencia to E. Webber re: Analysis of Biased Policing Complaints: July 1, 2014 - December 31, 2014	9-18-2019_Love.00002661 - 9-18-2019_Love.00002662	
65	8/30/2016	Email from M. O'Malley to C. Love re: Webinar-Implicit Bias	9-18-2019_Love.00006225 - 9-18-2019_Love.00006225	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
66	9/11/2017	Email from L. Garcia to C. Love re: Bias-Free Policing	6-20-19 Love DOJ Correspondence SC 003284	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
67	3/28/2018	Email from C. Love to J. Palen re: Bias Trng	9-18-2019_Love.00011142 - 9-18-2019_Love.00011143	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
68	4/18/2018	Email from C. Love to N. Zinser re: Biased Policing Cases in Need	9-18-2019_Love.00011191	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
69	1/17/2018	Email from M. Soto to A. O'Callaghan, P. Mahan, et al. re: Department Early Warning - Early Intervention System	Soto 6.20.19 SC2967 - Soto 6.20.19 SC2967	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.

Plaintiffs #1-21 v. County of Suffolk, et al.
Case No. 15-cv-2431 (E.D.N.Y.)
PLAINTIFFS' TRIAL EXHIBIT LIST

Temp. Doc. ID#	Date	Description	Bates Range	Objections
70	1/17/2018	Email from J. Rafferty to M. Soto re: Re: Department Early Warning - Early Intervention System	Soto 6.20.19 SC1129 - Soto 6.20.19 SC1129	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
71	9/3/2015	Email from C. Love to B. Buehler, G. Lolis re: USDOJ/SCPD: Document Request	6-20-19 Love DOJ Correspondence SC 024011 - 6-20-19 Love DOJ Correspondence SC 024062	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
72	11/24/2014	Email from A. Crawford to J. Meehan, E. Webber, et al. re: Agreement between the USDOJ and SCPD: Document Request	6-20-19 Love DOJ Correspondence SC 000946 - 6-20-19 Love DOJ Correspondence SC 000956	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
73	3/14/2018	E-mail from L. Garcia to C. Love, M. Goldberger, et al. re: Following up	6-20-19 Love DOJ Correspondence SC 003352 - 6-20-19 Love DOJ Correspondence SC 003359	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
74	4/23/2018	Email from M. Goldberger to C. Love, J. Volek, et al. re: DOJ Tour next week, attaching proposed schedule and other email correspondence	6-20-19 Love DOJ Correspondence SC 003380 - 6-20-19 Love DOJ Correspondence SC 003394	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
75	10/15/2018	Email from C. Love to K. Kenneally re: Data reports – site visit prep	6-20-19 Love DOJ Correspondence SC 024297 - 6-20-19 Love DOJ Correspondence SC 024304	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
76	8/30/2013	Email from G. Lolis to J. Morse re: Meeting, attaching SCPD DOJ Agreement	11-25-2019_SelectedMessages.00000754 - 11-25-2019_SelectedMessages.00000817	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
77	9/6/2013	Email from G. Lolis to D. Brown, E. Webber, et al. re: SCPD Agreement	11-25-2019_SelectedMessages.00000838 - 11-25-2019_SelectedMessages.00000916	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
78	9/4/2014	Email from C. Love to C. Hart, M. Goldberger, et al. re: Settlement Agreement (training materials)	6-20-19 Love DOJ Correspondence SC 012484 - 6-20-19 Love DOJ Correspondence SC 012491	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
79	10/14/2014	Email from C. Love to B. Buehler, C. Hart, et al. re: Settlement Agreement (training materials)	6-20-19 Love DOJ Correspondence SC 005226 - 6-20-19 Love DOJ Correspondence SC 005269	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
80	12/20/2018	Email from J. Volek to A. Rivera re: DOJ Agreement Question	Love 5.15.19 SC 707- Love 5.15.19 SC 709	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
81	1/1/2014	2014-2015 Possible CAD Hate Calls	D-3486 - D-3499	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
82	10/24/2018	Email from A. Rivera to C. Love re: Hate Crime stats 2017/2018	Love 5.15.19 SC 477 - Love 5.15.19 SC 477	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
83	3/2/2016	Email from J. McLaughlin to M. Soto re: Biased-Policing Complaint	6.20.19 SC61 - 6.20.19 SC61	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
84	12/4/2005	Email from C. Love to K. Fallon, et al. re: Hey guys, I read 600 pages of SCPD emails, here's what I learned, attaching Draft TSDCP Report	9-18-2019_Crawford.00008841 - 9-18-2019_Crawford.00008894	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
85	9/19/2016	Email from A. Gliganic to M. Soto re: New, Improved Spreadsheet, and attaching Language Access Audits: Internal Affairs Bureau	SC_Soto 028807- SC_Soto 028812	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
86	4/25/2017	Email from J. Barry to J. McLaughlin, Brian Michels, et al. re: FW: Untrained Hate/LAP, attaching list of untrained officers	10-17-2019_McLaughlin.00002323 - 10-17-2019_McLaughlin.00002337	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
87	6/21/2018	Email from K. Kenneally to M. Lewis, C. Hatton, et al. re: Bilingual Proficiency Certification use this list	10-17-2019_McLaughlin.00006196 - 10-17-2019_McLaughlin.00006200	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
88	10/1/2018	Email from J. Condolff to V. Maronski re: Language Line Audits	Love 5.15.19 SC 243 - Love 5.15.19 SC 245	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
89	10/1/2018	Email from C. Love to V. Maronski re: Language Line Access, attaching DOJ Update	5-15-19_Messages.00000352 - 5-15-19_Messages.00000356	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.

**Plaintiffs #1-21 v. County of Suffolk, et al.
Case No. 15-cv-2431 (E.D.N.Y.)
PLAINTIFFS' TRIAL EXHIBIT LIST**

Temp. Doc. ID#	Date	Description	Bates Range	Objections
90	5/31/2013	Email from B. Cassidy to E. Webber, J. Burke, et al. re: DOJ - Agreement requested by Feds	10-24-2019_Selected.00000226 - 10-24-2019_Selected.00000229	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
91	1/31/2014	Email from G. Lolis to D. Cohen, D. Brown, et al. re: Newsday - DA: Suffolk cop arrested after stealing money from Latino motorists (without redaction and without attachments)	Webber 5.15.19 SC5529 - Webber 5.15.19 SC5530	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
92	1/31/2014	Email from G. Lolis to D. Cohen, D. Brown, et al. re: Newsday - DA: Suffolk cop arrested after stealing money from Latino motorists	6-20-19 Love DOJ Correspondence SC 000013 - 6-20-19 Love DOJ Correspondence SC 000026	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
93	2/4/2014	Email from F. Webber to M. White, PIO, re: Website-Sgt. Greene	9-18-2019_Love.00000102 - 9-18-2019_Love.00000103	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
94	2/5/2014	Email from PIO to C. Love re: Suffolk Police Sergeant arrested for stealing cash during traffic stop; Hispanic victims may have been targeted	9-18-2019_Love.00000117 - 9-18-2019_Love.00000118	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
95	2/7/2014	Email from C. Love to M. Goldberger re: Newsday - DA: Suffolk cop arrested after stealing money from Latino motorists	6-20-19 Love DOJ Correspondence SC 012147 - 6-20-19 Love DOJ Correspondence SC 012158	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
96	2/17/2014	Email from K. Fallon to E. Webber re: Link to WNBC story	Webber 5.15.19 SC5677 - Webber 5.15.19 SC5677	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
97	2/19/2014	Email from M. White to E. Webber re: Sgt. Scott Greene	Webber 5.15.19 SC5723 - Webber 5.15.19 SC5724	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
98	3/3/2014	Email from C. Cooney-Tsante to E. Webber, J. Burke, et al. re: Univision Request re: Sgt. Scott Greene	Webber 5.15.19 SC5968 - Webber 5.15.19 SC5971	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
99	3/10/2014	Email from A. Beedenbender to C. Cooney-Tsante re: Newsday Inquiry Sgt. Scott A. Greene	9-18-2019_Love.00000227 - 9-18-2019_Love.00000229	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
100	3/19/2014	Email from M. White to E. Webber re: Meeting 5/1/13	Webber 5.15.19 SC6271 - Webber 5.15.19 SC6271	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
101	3/21/2014	Email from K. Fallon to E. Webber re: SCPD Interview	10-24-2019_Selected.00000521 - 10-24-2019_Selected.00000521	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
102	8/16/2014	Email from J. Meehan to J. Meehan re: Racist Incident in West Babylon at the Infinity Diner with Suffolk Police	10-17-2019_Meehan.00000047 - 10-17-2019_Meehan.00000048	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
103	9/22/2014	Email from B. Buehler to G. Lolis re: The United States' Questions and Concerns re: SCPD's Six-Month Compliance Report	6-20-19 Love DOJ Correspondence SC 000698 - 6-20-19 Love DOJ Correspondence SC 000714	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
104	9/26/2014	Email from J. Burke to J. Meehan, W. Madigan, et al. re: Meetings – Week of 9/29	Webber 5.15.19 SC09631 - Webber 5.15.19 SC09631	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
105	11/12/2014	Email from M. O'Malley to J. Meehan, J. Burke, et al. re: DOJ Initial training	Webber 5.15.19 SC10598 - Webber 5.15.19 SC10598	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
106	12/19/2014	Email from J. Burke to A. Crawford re: Letter to National Network for Safe Communities 5 Sites	9-18-2019_Crawford.00002636 - 9-18-2019_Crawford.00002638	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
107	1/9/2015	Email from A. Crawford to A. Valencia re: Complaint	9-18-2019_Crawford.00002891 - 9-18-2019_Crawford.00002891	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
108	3/23/2015	Email from M. Goldberger to G. Lolis, C. Love re: United States' Response to SCPD's Second Compliance Report	6-20-19 Love DOJ Correspondence SC 001398 - 6-20-19 Love DOJ Correspondence SC 001430	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
109	6/22/2015	Email from M. Goldberger to G. Lolis, C. Love re: SCPD Letter	6-20-19 Love DOJ Correspondence SC 001542 - 6-20-19 Love DOJ Correspondence SC 001557	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.

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110	7/15/2015	Email from C. Love to A. Crawford re: DOJ Conf Call 7-15-2015	6-20-19 Love DOJ Correspondence SC 017681 - 6-20-19 Love DOJ Correspondence SC 017683	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
111	10/29/2015	Email from C. Love to B. Buehler, M. Goldberger, et al. re: Doc requests	6-20-19 Love DOJ Correspondence SC 008417 - 6-20-19 Love DOJ Correspondence SC 008563	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
112	12/8/2015	Email from K. Fallon to PIO re: Hey Guys, I read 600 pages of SCPD emails, here's what I learned	11-25-2019_SelectedMessages.00002630 - 11-25-2019_SelectedMessages.00002682	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
113	1/5/2016	Email from W. Scrima to B. Buehler, M. Goldberger, et al. re: December Assessment - Training	6-20-19 Love DOJ Correspondence SC 002642 - 6-20-19 Love DOJ Correspondence SC 002643	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
114	1/7/2016	Email from A. Crawford to J. Brierton re: U visas	9-18-2019_Crawford.00009212 - 9-18-2019_Crawford.00009212	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
115	3/3/2016	Email from C. Love to C. Lane re: Suffolk Struggles To Reform Discriminatory Policing Against Latinos	9-18-2019 Love.00005476 - 9-18-2019 Love.00005476	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
116	6/23/2017	Email from L. Garcia to C. Love re: SCPD Fifth Assessment Report	6-20-19 Love DOJ Correspondence SC 003228 - 6-20-19 Love DOJ Correspondence SC 003254	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
117	11/6/2017	Email from L. Garcia to C. Love re: Follow up to USDOJ October 2017 Tour	6-20-19 Love DOJ Correspondence SC 003343 - 6-20-19 Love DOJ Correspondence SC 003346	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
118	10/9/2018	Email from N. Zinser to J. McLaughlin re: Legislative Report 3rd Quarter 2018, and attaching Incident Location Address List	10-17-2019_McLaughlin.00006813- 10-17-2019_McLaughlin.00006815	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
119	1/25/2019	Internal Correspondence from M. Shanahan to J. Skopek re: Legislative Quarterly Report - Fourth Quarter -2018 October 1, 2018 through December 31, 2018	RPD_0019076 - RPD_0019080	
120	4/11/2019	Internal Correspondence from M. Shanahan to J. Skopek re: Legislative Quarterly Report - First Quarter -2019 January 1, 2019 through March 31, 2019	RPD_0019088 - RPD_0019091	
121	7/19/2019	Internal Correspondence from M. Shanahan to J. Skopek re: Legislative Quarterly Report - Second Quarter -2019 April 1, 2019 through June 30, 2019	RPD_0019092 - RPD_0019096	
122	10/19/2019	Internal Correspondence from M. Shanahan to J. Skopek re: Legislative Quarterly Report - Third Quarter -2019 July 1, 2019 through September 30, 2019	RPD_0019097 - RPD_0019101	
123	4/16/2020	Email from J. Volek to C. Love re: Checking in	Exhibit Q to County Defendants' Motion for Summary Judgment	
124	11/12/2014	Email from C. Love to B. Buehler, C. Hart, et al. re: Settlement Agreement (Training materials)	6-20-19 Love DOJ Correspondence SC 005270 - 6-20-19 Love DOJ Correspondence SC 005317	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
125	11/7/2017	Email from C. Love to L. Garcia re: Follow up to USDOJ October 2017 Tour	6-20-19 Love DOJ Correspondence SC 012001 - 6-20-19 Love DOJ Correspondence SC 012004	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
126	2/26/2013	Email from A. Crawford to R. Lehmann re: Scott Greene	9-18-2019_Crawford.00000907 - 9-18-2019_Crawford.00000907	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
127	3/6/2014	Email from scpd-directives@suffolkcountyny.gov to scpd-directives@suffolkcountyny.gov re: DTB 14-05a Summary of Department Directives for Monthly Inspections	9-18-2019_Capolino.00000309 - 9-18-2019_Capolino.00000311	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
128	7/28/2015	Email from C. Love to C. Hart, G. Lolis re: Traffic Stop Data	6-20-19 Love DOJ Correspondence SC 017735 - 6-20-19 Love DOJ Correspondence SC 017767	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
129	12/17/2015	Email from M. Goldberger to C. Love re: Incomplete T-Stop Entries	6-20-19 Love DOJ Correspondence SC 008789 - 6-20-19 Love DOJ Correspondence SC 008789	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
130	9/11/2017	Email from L. Garcia to C. Love re: Data Collection	6-20-19 Love DOJ Correspondence SC 003283 - 6-20-19 Love DOJ Correspondence SC 003283	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.

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131	9/12/2017	Email from C. Love to L. Garcia re: Data Collection	6-20-19 Love DOJ Correspondence SC 011714 - 6-20-19 Love DOJ Correspondence SC 011715	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
132	10/24/2018	Email from F. Webber to C. Love, K. Kenneally re: CAD Upgrade	Love 5.15.19 SC 470 - Love 5.15.19 SC 470	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
133	2/8/2019	Email to undisclosed recipients re: FW: T-Stop Quarterly Report, attaching "t stop audit 6th pct 4 quarter 2018.doc"	11-25-2019_SelectedMessages.00008139-00008139 - 11-25-2019_SelectedMessages.00008139-00008144	Objection to email-11-25-2019_SelectedMessages.00008139-00008139 - Hearsay; No objection for purposes of impeachment or to refresh recollection. No objection to internal correspondence 11-25-2019_SelectedMessages.00008139-00008144
134	2/8/2019	Email from A. Crawford to T. Bafundo, J. Cahill, et al. re: T-Stop Annual Report	5-15-19_Messages.00000996-5-15-19_Messages.00001001	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
135	3/9/2020	Expert Report of Michael R. Smith		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
136	3/9/2020	Expert Report of Robert L. Stewart		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
137	9/24/2020	Declaration of Michael R. Smith		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
138	4/12/2012	Internal Correspondence re: Command Discipline Quarterly Reports	RPD_0020291 - RPD_0020339	
139	10/9/2012	Internal Correspondence re: Command Discipline 12-07-510	Early Alert Attachments 5.13.19 SC264 - Early Alert Attachments 5.13.19 SC275	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
140	2/21/2007	Internal Correspondence re: Civilian Complaint Investigation IA#2006-0854	D-20080 - D-20082	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
141	10/28/2006	Internal Correspondence re: Internal Affairs Bureau Case #06-120i Civilian Complaint Investigation	D-20087 - D-20093	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
142	7/26/2006	Internal Correspondence re: Internal Affairs Bureau Case # 06-38i HRC Complaint	D-20083 - D-20086	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
143	12/12/2006	Internal Correspondence re: Internal Affairs Bureau Case # 06-710i Civilian Complaint Investigation	D-20126 - D-20131	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
144	2/12/2008	Internal Correspondence re: Internal Affairs Bureau Case #07-224i (Citizen Complaint Report)	D-20197 - D-20205	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
145	8/6/2007	Internal Correspondence re: Internal Affairs Bureau Case #07-331i (Citizen Complaint Report)	D-20238 - D-20241	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
146	12/3/2008	Internal Correspondence re: Internal Affairs Bureau Case #2008-0162i Notice of Claim	D-20304 - D-20314	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
147	3/24/2009	Internal Correspondence re: Internal Affairs Bureau Case #08-442i Civilian Complaint	D-20326 - D-20334	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
148	4/7/2010	Internal Correspondence re: Internal Affairs Bureau Case #2009-0428i Civilian Complaint	D-20400 - D-20413	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance

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149	1/18/2010	Internal Correspondence re: Internal Affairs Bureau Case # 09-55i (Citizen Complaint Report)	D-20355 - D-20379	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
150	3/12/2012	Internal Correspondence re: Internal Affairs Bureau Case #2009-0871i Citizen Complaint Report	D-20448 - D-20453	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
151	1/26/2011	Internal Correspondence re: Internal Affairs Bureau Case #09-906i Notice of Claim	D-20454 - D-20466	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
152	11/14/2010	Internal Correspondence re: Internal Affairs Bureau Case #10-161i Citizen Complaint	D-20477 - D-20484	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
153	5/11/2011	Internal Correspondence re: Internal Affairs Bureau Case #10-173i (Human Rights Complaint)	D-20485 - D-20496	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
154	8/4/2016	Internal Correspondence re: Internal Affairs Case # 10-023i	9-18-2019_Love.00006239 - 9-18-2019_Love.00006242	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
155	8/19/2016	Internal Correspondence re: Internal Affairs Bureau Case # 10-23i	D-20470 - D-20476	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
156	8/19/2016	Attachment list and attachments to IAB Case # 10-23i	9-18-2019_Love.00006243 - 9-18-2019_Love.00006335	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
157	2/1/2011	Internal Correspondence re: Internal Affairs Bureau Case #10-688i Civilian Complaint	D-20524 - D-20530	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
158	7/1/2011	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification	D-20075 - D-20076	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
159	10/6/2015	Internal Correspondence re: Internal Affairs Case # 11-611i, attaching Internal Correspondence and O. Zelaya v. SCPD Complaint	9-18-2019_Love.00004940 - 9-18-2019_Love.00004953	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
160	2/17/2016	Email re: Completed IAB Cases 2 of 2, attaching PDFs of IAB #11-661i, IAB #14-424i, IAB #15-02i, IAB #15-318i, IAB #14-727i, IAB #14-92i, and 14-608i	6-20-19 Love DOJ Correspondence SC 009101 - 6-20-19 Love DOJ Correspondence SC 009297	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
161	6/28/2013	Internal Affairs Case Notes re: Case # 11-975i	Love Deposition Exhibit 32	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
162	6/26/2018	Internal Correspondence re: Internal Affairs Case #11-975i, attaching Internal Correspondence and Misdemeanor Complaint	10.30.19 SC 000001 - 10.30.19 SC 000041	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
163	Undated	Concise Officer History	10.30.19 SC 000044 - 10.30.19 SC 000046	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
164	6/11/2012	SCPD Internal Correspondence re: Internal Affairs Bureau IA #12-443, with attachments		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
165	8/14/2012	SCPD Internal Correspondence re: Civilian Complaint - Investigation IA #12-0443, with attachment list		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
166	8/17/2012	SCPD Internal Correspondence re: Alert # 12-0443		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
167	6/18/2012	Citizen Complaint re: IA No. 2012-0466i	RPD_0001796 - RPD_0001802	
168	6/18/2012	SCPD Acknowledgment of Complaint re: IA # 12-466i	Lehmann Deposition Exhibit 3	
169	6/20/2012	Internal Affairs Case Notes re: Case #12-466i	Early Alert Attachments 5.13.19 SC83 - Early Alert Attachments 5.13.19 SC86	

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170	6/20/2012	Internal Affairs Case Notes re: Case #12-466i (with additional entry)	1/31/19 SC 126 - 1/31/19 SC 129	
171	6/25/2012	Internal Correspondence re: Internal Affairs Bureau Investigations, Case #12-466i	Early Alert Attachments 5.13.19 SC119 - Early Alert Attachments 5.13.19 SC124	
172	8/18/2014	Internal Correspondence re: Internal Affairs Bureau Case #12-466i Civilian Complaint Investigation	RPD_0001823 - RPD_0001831	
173	12/15/2014	Internal Correspondence re: IAB # 12-466i, attaching confidential records of Internal Correspondence	D-14903 - D-14931	
174	3/15/2016	Email re: Sgt. Greene / Review of IAB #12-466i, attaching Greene IAB Case Review	9-18-2019_Crawford.00009937 - 9-18-2019_Crawford.00009941	
175	7/3/2012	Internal Correspondence re: Internal Affairs Bureau Alert Report for IA# 12-499i, with attachments	RPD_0001840 - RPD_0001949	
176	7/9/2012	Internal Affairs Case Notes re: Case #12-499i	RPD_0017485 - RPD_0017486	
177	12/4/2014	Internal Correspondence re: IAB Case# 12-499i, with attachment list	RPD_0001957 - RPD_0001964	
178	12/8/2014	Internal Correspondence re: IAB #12-499i	RPD_0001956 - RPD_0001956	
179	3/15/2016	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification	12/11/18 SC 105 - 12/11/18 SC 107	
180	7/30/2012	Incident Summary Report re: IAB Case #12-555	SC 2.15.19 79 - SC 2.15.19 80	
181	8/10/2012	Attachments to IAB Case #12-583i	RPD_0001966 - RPD_0002078	
182	8/10/2012	Citizen Complaint re: IAB Case #2012-0583i	12/11/18 SC 1 - 12/11/18 SC 4	
183	8/28/2012	Internal Affairs Case Notes re: IAB Case #12-583i	RPD_0017487 - RPD_0017491	
184	5/3/2016	Examination Before Trial	RPD_0002144 - RPD_0002276	
185	12/18/2017	Attachment list to IAB Case #12-583i	RPD_0001965 - RPD_0001965	
186	12/18/2017	Internal Correspondence re: Internal Affairs Bureau Case #12-583i Summons & Complaint/Notice of Claim	RPD_0002127 - RPD_0002143	
187	2/5/2018	Internal Correspondence re: Internal Affairs Case #12-583i	RPD_0002123 - RPD_0002126	
188	8/13/2012	Incident Summary Report re: IAB Case #12-593i	SC 2.15.19 122 - SC 2.15.19 124	
189	8/13/2012	Arrest record, Incident report attachments to IAB Case #12-593i	RPD_0002282 - RPD_0002361	
190	6/8/2016	Internal Correspondence re: Internal Affairs Bureau Case #12-593i Civilian Complaint	RPD_0002362 - RPD_0002370	
191	9/1/2016	Internal Correspondence re: Internal Affairs Case #12-593i	RPD_0002371 - RPD_0002372	
192	9/19/2012	Internal Correspondence re: Internal Investigation	Early Alert Attachments 5.13.19 SC 256 - Early Alert Attachments 5.13.19 SC 263	
193	10/25/2012	Citizen Complaint re: IAB Case #12-796, attaching Citizens Complaint Summary and SCPD Incident Report	RPD_0000410 - RPD_0000443	
194	10/25/2012	Incident Summary Report re: IAB Case #12-796	SC 2.15.19 6 - SC 2.15.19 7	
195	11/7/2012	Internal Correspondence re: Internal Affairs Bureau IA # 12-807 (Complaint Investigation Guide)	Early Alert Attachments 5.13.19 SC310 - Early Alert Attachments 5.13.19 SC310	
196	11/12/2012	Internal Correspondence re: Alert Acknowledgment IA# 12-807, attaching internal correspondence and detail reports	RPD_0017209 - RPD_0017262	
197	1/23/2013	Internal Correspondence re: Alert #A12-0807	RPD_0002403 - RPD_0002406	
198	2/12/2013	Internal Correspondence re: Civilian Complaint Investigation #12-0807	RPD_0002407 - RPD_0002407	

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199	Undated	Additional attachments to IAB Case #12-807	Early Alert Attachments 5.13.19 SC276 - Early Alert Attachments 5.13.19 SC314	
200	12/13/2012	Internal Correspondence re: Notification, attaching handwritten notes	RPD_0000444 - RPD_0000452	
201	1/1/2012	IAB #12-922i Photographs of Complainant [Undated]	RPD_0002438 - RPD_0002449	
202	12/14/2012	Internal Affairs Case Notes re: Case #12-922i	Early Alert Attachments 5.13.19 SC347 - Early Alert Attachments 5.13.19 SC349	
203	12/14/2012	Attached Stipulation and Agreement to IAB Case #12-922i	RPD_0002409 - RPD_0002416	
204	12/10/2013	Internal Correspondence re: Internal Affairs Bureau Case #12-922i	RPD_0002417 - RPD_0002426	
205	12/10/2013	Attachment List for IAB Case #12-922i	RPD_0002408 - RPD_0002408	
206	1/27/2014	Internal Correspondence re: Internal Affairs Case #2012-922i	RPD_0002427 - RPD_0002429	
207	4/24/2013	IAB #13-179 IAB Summary Reports of Civilian Complaints	SC 2.15.19 135 - SC 2.15.19 148	
208	3/4/2015	Internal Correspondence re: IAB #13-227i, attaching internal correspondence	9-18-2019_Love.00003888 - 9-18-2019_Love.00003978	
209	1/16/2013	Citizen Complaint re: IAB Case #13-30	RPD_0002450 - RPD_0002460	
210	1/16/2013	Incident Summary Report re: IAB Case #13-30	SC 2.15.19 131 - SC 2.15.19 131	
211	8/4/2013	Incident Summary Report re: IAB Case #13-402	SC 2.15.19 15 - SC 2.15.19 16	
212	10/15/2015	SCPD Internal Correspondence re: Internal Affairs Case #13-542i, with attachments	9-18-2019_Love.00004127 - 9-18-2019_Love.00004236	
213	11/21/2013	Attachments to IAB Case #13-756	RPD_0002461 - RPD_0002470	
214	6/25/2015	Attachments to IAB Case #13-822i	RPD_0000455 - RPD_0000467	
215	6/25/2015	SCPD Internal Correspondence re: Internal Affairs Bureau Case #13-822i	9-18-2019_Love.00005557 - 9-18-2019_Love.00005561	
216	6/29/2015	SCPD Internal Correspondence re: Internal Affairs Case #13-822i	9-18-2019_Love.00005556 - 9-18-2019_Love.00005556	
217	2/23/2015	Internal Correspondence re: IAB 14-128i, attaching IAB investigation report and attachments	9-18-2019_Crawford.00003326 - 9-18-2019_Crawford.00003356	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
218	2/20/2015	Email re: Completed Biased Policing Case, attaching IAB Case # 14-155i investigation report and attachments	9-18-2019_Love.00002947 - 9-18-2019_Love.00002990	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
219	4/1/2014	Citizen Complaint re: IAB Case #14-220i	12/11/2018 SC 12 - 12/11/2018 SC 14	
220	8/4/2015	Attachments to IAB Case #14-220i	RPD_0002680 - RPD_0002862	
221	8/4/2015	Internal Correspondence re: IAB Case #14-220i	RPD_0002863 - RPD_0002869	
222	1/27/2016	Internal Correspondence re: Internal Affairs Case #2014-220i	RPD_0002870 - RPD_0002872	

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223	7/16/2014	Incident Summary Report re: IAB Case #14-288	SC 2.15.19 189 - SC 2.15.19 190	
224	12/15/2014	SCPD Internal Correspondence re: IAB #14-309, with attachments	9-18-2019_Crawford00003357 - 9-18-2019_Crawford00003443	
225	8/31/2014	Incident Summary Report re: IAB Case #14-359	SC 2.15.19 27 - SC 2.15.19 27	
226	1/1/2014	IAB #14-460 IAB Summary Reports of Civilian Complaints	SC 2.15.19 91 - SC 2.15.19 201	
227	1/21/2014	Citizen Complaint re: IAB Case #14-49i	12/11/2018 SC 5 - 12/11/2018 SC 8	
228	2/12/2014	Internal Affairs Case Notes for IAB Case #14-49i	RPD_0018388 - RPD_0018388	
229	9/8/2014	Transcript of 50-H Hearing	RPD_0002588 - RPD_0002679	
230	7/13/2015	Internal Correspondence re: Internal Affairs Bureau Case #14-49i Notice of Claim/Summons & Complaint	RPD_0000649 - RPD_0000654	
231	8/4/2015	Internal Correspondence re: Internal Affairs Case #2014-49i, with attachment	9-18-2019_Love.00004313 - 9-18-2019_Love.00004394	
232	9/10/2015	Email re: 14-565i, attaching IAB Case #14-565i investigation report and attachments	9-18-2019_Love.00003981 - 9-18-2019_Love.00004004	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
233	8/21/2014	Incident Summary Report re: IAB Case #14-575	SC 2.15.19 212 - SC 2.15.19 213	
234	3/3/2015	Internal Correspondence re: IAB 14-582i, attaching internal correspondence and civilian arrest form	9-18-2019_Crawford.00003444 - 9-18-2019_Crawford.00003496	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
235	8/29/2014	Citizen Complaint re: IAB Case #14-608i	SC 2.15.19 209 - SC 2.15.19 210	
236	9/23/2014	Internal Affairs Case Notes for IAB Case #14-608i	Early Alert Attachments 5.13.19 SC442 - Early Alert Attachments 5.13.19 SC442	
237	5/18/2015	Attachment List and Attaching motor vehicle records to IAB Case #14-608i	RPD_0002890 - RPD_0002921	
238	5/18/2015	Internal Correspondence re: Internal Affairs Bureau Case # 14-608i Civilian Complaint	RPD_0002922 - RPD_0002926	
239	6/24/2015	Internal Correspondence re: Internal Affairs Case #14-608i, attaching internal correspondence and field reports	6-20-19_Love DOJ Correspondence SC 009261 - 6-20-19_Love DOJ Correspondence SC 009297	
240	11/7/2014	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification	D-20070 - D-20076	
241	10/21/2014	Citizen Complaint re: IAB Case #14-726i	12/11/18 SC 9 - 12/11/18 SC 11	
242	12/21/2017	Attachment list and Attachments to IAB Case #14-726i	RPD_0000659 - RPD_0000678	
243	12/21/2017	Internal Correspondence re: Internal Affairs Bureau Case #14-726i, with attachment list	RPD_0000681 - RPD_0000687	
244	2/24/2018	Internal Correspondence re: Internal Affairs Case #14-726i	RPD_0000679 - RPD_0000680	
245	3/8/2016	Email re: comp letter, with attachment	10-17-2019_McLaughlin.00000308 - 10-17-2019_McLaughlin.00000309	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
246	2/20/2015	Incident Summary Report re: IAB Case #15-103i	SC 2.15.19 202 - SC 2.15.19 203	
247	2/26/2015	SCPD Internal Correspondence re: Internal Affairs Case #15-135, with attachments	RPD_0000746 - RPD_0000757	

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Temp. Doc. ID#	Date	Description	Bates Range	Objections
248	2/26/2016	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification	D-20067 - D-20068	
249	11/29/2016	Email re: IA#15-159i, attaching case report and attachments for IA Case #15-159i	9-18-2019_Love.00006480 - 9-18-2019_Love.00006520	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
250	11/28/2016	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification	12/11/18 SC 117 - 12/11/18 SC 119	
251	1/7/2017	Attachment list and Attachments to IAB Case #15-168i	RPD_0002994 - RPD_0003021	
252	1/7/2017	Internal Correspondence re: Internal Affairs Bureau Case #15-168i	RPD_0003022 - RPD_0003034	
253	1/16/2017	Internal Correspondence re: Internal Affairs Case #15-168i	RPD_0003035 - RPD_0003037	
254	11/28/2016	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification	12/11/2018 SC 129 - 12/11/2018 SC 131	
255	3/6/2017	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification	12/11/2018 SC 159 - 12/11/2018 SC 161	
256	11/18/2015	Internal Correspondence re: Internal Affairs Case #15-0002i, attaching field reports and internal correspondence	9-18-2019_Love.00005019 - 9-18-2019_Love.00005059	
257	6/10/2015	Internal Affairs Case Notes re: IAB Case #15-316i	RPD_0017599 - RPD_0017600	
258	6/10/2015	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification	12/11/18 SC 96 - 12/11/18 SC 98	
259	6/6/2017	Attachment List and Attaching Police complaint form to IAB Case #15-316i	RPD_0003075 - RPD_0003092	
260	6/6/2017	Internal Correspondence re: Internal Affairs Bureau Case #15-316i Civilian Complaint/Human Rights Commission	RPD_0003093 - RPD_0003098	
261	6/26/2017	Internal Correspondence re: Internal Affairs Case # 15-316i	RPD_0003099 - RPD_0003100	
262	1/19/2016	Letter from SCPD, attaching IAB investigation report and attachments for IAB Case #15-373i	RPD_0000794 - RPD_0000829	
263	3/15/2016	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification	12/11/18 SC 108 - 12/11/18 SC 110	
264	9/20/2015	Incident Summary Report re: IAB Case #15-389	SC 2.15.19 39 - SC 2.15.19 42	
265	8/2/2016	Attachment list and attachments to IAB Case # 15-402i	RPD_0000830 - RPD_0000913	
266	8/2/2016	Internal Correspondence re: Internal Affairs Bureau Case# 15-402i	RPD_0000914 - RPD_0000924	
267	11/28/2016	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification	12/11/18 SC 120 - 12/11/18 SC 122	
268	12/3/2016	Internal Correspondence re: Internal Affairs Case # 15-402i	RPD_0000938 - RPD_0000940	
269	12/5/2016	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification	12/11/2018 SC 114 - 12/11/2018 SC 116	
270	8/13/2015	Attachments of incident report and internal correspondence to IAB Case #15-481i	RPD_0003358 - RPD_0003368	
271	8/17/2015	Internal Affairs Case Notes re: IAB Case #15-481i	Early Alert Attachments 5.13.19 SC837 - Early Alert Attachments 5.13.19 SC837	
272	9/30/2016	Attachment List to IAB Case #15-481i	RPD_0003357 - RPD_0003357	
273	9/30/2016	Internal Correspondence re: Internal Affairs Bureau Case #15-481i Administrative Investigation	RPD_0003373 - RPD_0003376	
274	10/3/2016	Internal Correspondence re: Internal Affairs Case #15-481i	RPD_0003377 - RPD_0003378	
275	11/21/2015	Incident Summary Report re: IAB Case #15-514	SC 2.15.19 149 - SC 2.15.19 150	

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Temp. Doc. ID#	Date	Description	Bates Range	Objections
276	8/26/2015	Attachments to IAB Case #15-524i	RPD_0003380 - RPD_0003424	
277	9/1/2015	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification	12/1/18 SC 99 - 12/1/18 SC 101	
278	9/2/2015	Internal Affairs Case Notes re: IAB Case #15-524i	Early Alert Attachments 5.13.19 SC926 - Early Alert Attachments 5.13.19 SC926	
279	1/12/2016	Internal Correspondence re: Internal Affairs Bureau Case # 15-524i Civilian Complaint	RPD_0003425 - RPD_0003430	
280	1/12/2016	Civilian complaint attachment list for IAB Case #15-524i	RPD_0003379 - RPD_0003379	
281	1/20/2016	Internal Correspondence re: Internal Affairs Case #2015-524i	RPD_0003431 - RPD_0003433	
282	5/1/2015	Incident Summary Report re: IAB Case #15-558i	SC 2.15.19 74 - SC 2.15.19 75	
283	2/3/2017	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification	12/11/18 SC 141 - 12/11/18 SC 143	
284	7/25/2017	Internal Correspondence re: Internal Affairs Case #15-558ic, attaching additional correspondence and attachments	1/31/19 SC 30 - 131/19 SC 146	
285	7/25/2017	Internal Correspondence re: Internal Affairs Case #15-558ic (without document obstruction)	RPD_0003550 - RPD_0003553	
286	9/11/2015	Incident Summary Report re: IAB Case #15-582	SC 2.15.19 101 - SC 2.15.19 102	
287	7/27/2017	Internal Correspondence re: Internal Affairs Case #15-770i, with attachments	1/31/19 SC 149 - 1/31/19 SC 280	
288	3/15/2016	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification	12/11/2018 SC 105 - 12/11/2018 SC 107	
289	3/15/2016	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification (different redactions)	9/17/18 SC 10 - 9/17/18 SC 12	
290	11/14/2016	Internal Correspondence re: Internal Affairs Case #16-151i, attaching internal correspondence	9-18-2019_Love.00006862 - 9-18-2019_Love.00006888	
291	6/12/2016	Incident Summary Report re: IAB Case #16-234	SC 2.15.19 217 - SC 2.15.19 218	
292	5/9/2016	Internal Affairs Case Notes for Case #16-299i	RPD_0017501 - RPD_0017502	
293	5/30/2016	Audio Visual File re: IAB #16-299i	RPD_0003896 - RPD_0003896	
294	5/30/2016	Audio Visual File re: IAB #16-299i	RPD_0003899 - RPD_0003899	
295	6/9/2016	Audio Visual File re: IAB #16-299i	RPD_0003895 - RPD_0003895	
296	6/25/2016	Attachment List for IAB Case #16-299i	RPD_0003876 - RPD_0003876	
297	7/27/2016	Internal Correspondence re: Internal Affairs Case #16-299i, attaching internal correspondence and uniform traffic ticket	9-18-2019_Love.00006460 - 9-18-2019_Love.00006479	
298	11/9/2016	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification	12/11/18 SC 111 - 12/11/18 SC 113	
299	6/26/2017	Attachment List and Attaching Citizen Complaint Report and internal correspondence for IAB Case #16-32i	RPD_0003594 - RPD_0003613	
300	6/26/2017	Internal Correspondence re: Internal Affairs Bureau Case # 16-32i Civilian Complaint	RPD_0003620 - RPD_0003626	
301	6/28/2017	Internal Correspondence re: Internal Affairs Case # 16-32i	RPD_0003627 - RPD_0003628	
302	7/7/2017	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification	12/11/18 SC 144 - 12/11/18 SC 146	
303	6/14/2016	Internal Affairs Case Notes for Case #16-358i	RPD_0017505 - RPD_0017506	

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304	6/22/2016	Audio Visual File re: IAB #16-358i	RPD_0003908 - RPD_0003908	
305	7/21/2016	Audio Visual File re: IAB #16-358i	RPD_0003907 - RPD_0003907	
306	9/29/2016	Audio Visual File re: IAB #16-358i	RPD_0003912 - RPD_0003912	
307	12/9/2016	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification	RPD_0018415 - RPD_0018417	
308	12/9/2016	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification	12/11/18 SC 132 - 12/11/18 SC 134	
309	1/31/2017	Audio Visual File re: IAB #16-358i	RPD_0003909 - RPD_0003909	
310	1/31/2017	Audio Visual File re: IAB #16-358i	RPD_0003910 - RPD_0003910	
311	4/11/2017	Audio Visual File re: IAB #16-358i	RPD_0003911 - RPD_0003911	
312	6/3/2017	Attachment List and attaching Notice of Claim and Citizen Complaint Report for IAB Case #16-358i	RPD_0001212 - RPD_0001234	
313	6/3/2017	Internal Correspondence re: Internal Affairs Bureau Case #16-358i Notice of Claim/Civilian Complaint	RPD_0001238 - RPD_0001247	
314	11/9/2017	Internal Correspondence re: Internal Affairs Bureau Case #16-358i	RPD_0001235 - RPD_0001237	
315	11/14/2017	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification	RPD_0018418 - RPD_0018420	
316	2/8/2016	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification	12/11/18 SC 102 - 12/11/18 SC 104	
317	2/8/2016	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification	D-20065 - D-20069	
318	8/24/2016	Internal Correspondence re: Internal Affairs Case #16-60i, with attachments	1/31/19 SC 281 - 1/31/19 SC 375	
319	11/28/2016	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification	12/11/18 SC 126 - 12/11/18 SC 128	
320	2/7/2018	Attachment List and Attachments to IAB Case #16-688i	RPD_0003955 - RPD_0003962	
321	2/7/2018	Internal Correspondence re: Internal Affairs Bureau Case #2016-688i	RPD_0003963 - RPD_0003968	
322	2/8/2018	Internal Correspondence re: Internal Affairs Case #16-688i	RPD_0003969 - RPD_0003971	
323	10/1/2016	Incident Summary Report re: IAB Case #16-739	SC 2.15.19 104 - SC 2.15.19 104	
324	10/25/2016	Internal Affairs Case Notes for Case #16-745i	RPD_0017522 - RPD_0017523	
325	10/25/2016	Attachments of internal correspondence, field reports, domestic incident reports, to IAB Case #16-745i	RPD_0003979 - RPD_0004026	
326	5/23/2017	Internal Correspondence re: Internal Affairs Bureau Case #16-745i Administrative	RPD_0004027 - RPD_0004032	
327	5/23/2017	Attachment List for IAB Case #16-745i	RPD_0003978 - RPD_0003978	
328	5/26/2017	Internal Correspondence re: Internal Affairs Case #16-745i	RPD_0004033 - RPD_0004034	
329	1/12/2017	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification	12/11/2018 SC 138 - 12/11/2018 SC 140	
330	6/3/2017	Incident Summary Report re: IAB Case #17-189	SC 2.15.19 109 - SC 2.15.19 109	
331	5/16/2017	Incident Summary Report re: IAB Case #17-27	SC 2.15.19 55 - SC 2.15.19 56	
332	6/5/2017	Citizen Complaint re: IAB Case #17-450i	12/11/2018 SC 15 - 12/11/2018 SC 16	

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Temp. Doc. ID#	Date	Description		Bates Range	Objections
333	6/5/2017	Incident Summary Report re: IAB Case #17-450i		SC 2.15.19 205 - SC 2.15.19 208	
334	11/29/2018	Attachment list and Attachments to IAB Case #17-450i		RPD_0004063 - RPD_0004132	
335	11/29/2018	Additional attachments to IAB Case #17-450i		RPD_0004150 - RPD_0004170	
336	11/29/2018	Internal Correspondence re: Internal Affairs Bureau Case #17-450i		RPD_0004133 - RPD_0004146	
337	11/30/2018	Internal Correspondence re: Internal Affairs Case # 17-450i		RPD_0004147 - RPD_0004149	
338	9/27/2017	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification		12/11/2018 SC 147 - 12/11/2018 SC 149	
339	1/9/2019	Attachment list and Attachments to IAB Case #17-753i		RPD_0004179 - RPD_0004202	
340	1/9/2019	Internal Correspondence re: Internal Affairs Bureau Case # 17-753i		RPD_0004203 - RPD_0004209	
341	1/12/2019	Internal Correspondence re: IAB # 17-753i		RPD_0004210 - RPD_0004212	
342	10/25/2017	Incident Summary Report re: IAB Case #17-846		SC 2.15.19 57 - SC 2.15.19 58	
343	5/2/2018	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification		12/11/2018 SC 156 - 12/11/2018 SC 158	
344	6/4/2018	Attachments to IAB Case # 18-321i		RPD_0001608 - RPD_0001617	
345	9/3/2018	Attachments to IAB Case # 18-321i		RPD_0001386 - RPD_0001590	
346	9/3/2018	Internal Correspondence re: Internal Affairs Bureau Case #18-321i		RPD_0001591 - RPD_0001607	
347	3/15/2019	Internal Correspondence re: Internal Affairs Case # 18-321i		RPD_0001618 - RPD_0001620	
348	4/27/2018	Attachments of traffic tickets to IAB Case #18-351i		RPD_0004874 - RPD_0004880	
349	5/3/2018	Internal Affairs Case Notes for Case #18-351i		RPD_0017567 - RPD_0017567	
350	1/12/2019	Attachment List for IAB Case #18-351i		RPD_0004873 - RPD_0004873	
351	1/12/2019	Internal Correspondence re: Internal Affairs Bureau Case #18-351i Civilian Complaint		RPD_0004881 - RPD_0004885	
352	2/11/2019	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification		RPD_0017568 - RPD_0017571	
353	4/29/2019	Internal Correspondence re: Internal Affairs Case #18-351i		RPD_0004886 - RPD_0004887	
354	1/18/2018	Attachments of medical records to IAB Case #18-47i		RPD_0004221 - RPD_0004269	
355	1/22/2018	Internal Affairs Case Notes for Case #18-47i		RPD_0017530 - RPD_0017535	
356	1/22/2018	Media Attachments to IAB Case #18-47i		RPD_0004270 - RPD_0004278	
357	1/30/2018	SCPD Internal Affairs Bureau - Biased Policing Early Intervention Notification		12/11/18 SC 153 - 12/11/18 SC 155	
358	4/9/2018	Notice of Claim		RPD_0004552 - RPD_0004560	
359	4/17/2018	Notice of Claim		RPD_0004406 - RPD_0004412	
360	7/31/2018	Deposition Transcript		RPD_0004319 - RPD_0004405	
361	7/31/2018	Deposition Transcript		RPD_0004561 - RPD_0004618	

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362	2/4/2019	Summons & Complaint	RPD_0004538 - RPD_0004551	
363	3/9/2019	Internal Correspondence re: Internal Affairs Bureau Case # 18-47i Summons & Complaint/Notice of Claim/Civilian Complaint	RPD_0004291 - RPD_0004312	
364	3/9/2019	Attachment List for IAB Case #18-47i	RPD_0004219 - RPD_0004220	
365	5/15/2019	Internal Correspondence re: Internal Affairs Case #18-47i	RPD_0004313 - RPD_0004316	
366	6/7/2019	Photo Attachments to IAB Case #18-47i	RPD_0004279 - RPD_0004280	
367	6/7/2019	Photo Attachments to IAB Case #18-47i	RPD_0004281 - RPD_0004290	
368	7/26/2018	Citizen Complaint re: IAB Case #2018-564i	RPD_0004891 - RPD_0004893	
369	10/16/2018	Incident Summary Report re: IAB Case #18-63	SC 2.15.19 182 - SC 2.15.19 183	
370	8/15/2018	Citizen Complaint re: IAB Case #18-637i	RPD_0004894 - RPD_0004897	
371	11/28/2018	Citizen Complaint re: IAB Case #18-864i	RPD_0004898 - RPD_0004900	
372	12/20/2018	Citizen Complaint re: IAB Case #18-902i	RPD_0001793 - RPD_0001795	
373	12/26/2018	Citizen Complaint re: IAB Case #18-913i	RPD_0004904 - RPD_0004906	
374	10/31/2006	SCPD Department Directives: Internal Affairs Bureau Mission/Policy Statement; Internal Affairs Bureau Early Intervention System - Amended; Internal Affairs Bureau Duties and Responsibilities - Amended; Suspension of Department Members	10-17-2019_McLaughlin.00004806 - 10-17-2019_McLaughlin.00004817	
375	2/8/2010	SCPD Civilian Complaint Investigations: A basic guide to the process	D-16324 - D-16333	
376	1/1/2011	IAB Case Summaries from 2011 to 2018	10-17-2019_McLaughlin.00009905 - 10-17-2019_McLaughlin.00009939	
377	11/12/2014	Email from K. McGowan to C. Love re: Bias Free Policing and Legal Issues and Attachment PowerPoint	9-18-2019_Love.00001069- 9-18-2019_Love.00001106	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
378	2/1/2015	Suffolk County Police Academy Bias Free Policing Training Records (2/1/2015 - 2/1/2016)	D-5546 - D-5573	
379	2/3/2015	Email from J. Quaranto to E. Webber re: FW: IAB Profile, attaching profile outline	11-25-2019_SelectedMessages.00002032 - 11-25-2019_SelectedMessages.00002039	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
380	9/24/2015	SCPD Civilian Complaint Investigations	10-17-2019_McLaughlin.00004862 - 10-17-2019_McLaughlin.00004876	
381	10/2/2015	IAB Complaint Log	D-19265 - D-19279	
382	10/9/2015	IAB Summary Reports of Civilian Complaints	SC 2.15.191 - SC 2.15.194	
383	7/27/2016	Internal Correspondence from N. Zinser to J. McLaughlin re: Legislative Quarterly Report - Second Quarter -2016 April 1, 2016 through June 30, 2016	RPD_0019020 - RPD_0019023	
384	10/14/2016	Email from J. Blaskiewicz to J. McLaughlin re: Training Attachment, attaching training guide	SC_McLaughlin 112259 - SC_McLaughlin 112281	
385	10/22/2016	Internal Correspondence from N. Zinser to J. McLaughlin re: Legislative Quarterly Report - Third Quarter -2016 July 1, 2016 through September 30, 2016	RPD_0019024 - RPD_0019027	
386	1/11/2017	Internal Correspondence from N. Zinser to J. McLaughlin re: Legislative Quarterly Report - Fourth Quarter -2016 October 1, 2016 through December 31, 2016	RPD_0019028 - RPD_0019031	
387	4/18/2017	Internal Correspondence from J. McLaughlin to J. Barry re: Legislative Quarterly Report - First Quarter -2017 January 1, 2017 through March 31, 2017	RPD_0019038 - RPD_0019041	

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388	7/10/2017	Internal Correspondence from J. McLaughlin to J. Barry re: Legislative Quarterly Report - Second Quarter -2017 April 1, 2017 through June 30, 2017	RPD_0019042 - RPD_0019045	
389	8/15/2017	Email from C. Love to J. McLaughlin and M. Shanahan re: LCAC Meeting	SC_McLaughlin 104241 - SC_McLaughlin 104241	
390	10/23/2017	Internal Correspondence from J. McLaughlin to J. Barry re: Legislative Quarterly Report - Third Quarter -2017 July 1, 2017 through September 30, 2017	RPD_0019046 - RPD_0019050	
391	11/2/2017	Email from T. Fontana to C. Love and J. McLaughlin re: IAB Training Manual, attaching IAB training manual	10-17-2019_McLaughlin.00004800 - 10-17-2019_McLaughlin.00005091	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
392	1/10/2018	Internal Correspondence from J. McLaughlin to J. Barry re: Legislative Quarterly Report - Fourth Quarter -2017 October 1, 2017 through December 31, 2017	RPD_0019051 - RPD_0019055	
393	4/24/2018	Internal Correspondence from J. McLaughlin to G. Hart re: Legislative Quarterly Report - First Quarter -2018 January 1, 2018 through March 31, 2018	RPD_0019062 - RPD_0019066	
394	6/1/2018	Internal Correspondence re: Language Line Audit #2018-0031	10-17-2019_McLaughlin.00006097 - 10-17-2019_McLaughlin.00006098	
395	7/17/2018	Internal Correspondence from J. McLaughlin to J. Skopek re: Legislative Quarterly Report - Second Quarter -2018 April 1, 2018 through June 30, 2018	RPD_0019067 - RPD_0019070	
396	1/3/2019	Email from M. Cunningham to J. McLaughlin re: Final Version of IAB Case Summary 2011-2018, attaching IAB case summaries	9-18-2019_McLaughlinMB.00010484 - 9-18-2019_McLaughlinMB.00010519	
397	1/11/2019	Amended Complaint, Garcia v. County of Suffolk et al., No. 18-cv-3675 (E.D.N.Y. 2019)		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
398	Undated	Internal Affairs Bureau - Training Manual Table of Contents	SC_McLaughlin 104238 - SC_McLaughlin 104240	
399		Compilation of IAB Summary Reports of Civilian Complaints	SC 2.15.19 1 - SC 2.15.19 218	
400	3/31/2020	Declaration of Plaintiff #1 in Support of Plaintiffs' Motion for Class Certification		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
401	4/2/2020	Declaration of Plaintiff #3 in Support of Plaintiffs' Motion for Class Certification		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
402	4/3/2020	Declaration of Plaintiff #11 in Support of Plaintiffs' Motion for Class Certification		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
403	4/3/2020	Declaration of Plaintiff #15 in Support of Plaintiffs' Motion for Class Certification		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
404	4/3/2020	Declaration of Plaintiff #20 in Support of Plaintiffs' Motion for Class Certification		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
405	4/3/2020	Declaration of Plaintiff #9 in Support of Plaintiffs' Motion for Class Certification		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
406	4/4/2020	Declaration of Plaintiff #16 in Support of Plaintiffs' Motion for Class Certification		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
407	4/4/2020	Declaration of Plaintiff #17 in Support of Plaintiffs' Motion for Class Certification		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
408	4/4/2020	Declaration of Plaintiff #19 in Support of Plaintiffs' Motion for Class Certification		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
409	4/4/2020	Declaration of Plaintiff #12 in Support of Plaintiffs' Motion for Class Certification		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
410	4/4/2020	Declaration of Plaintiff #13 in Support of Plaintiffs' Motion for Class Certification		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.

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411	4/4/2020	Declaration of Plaintiff #18 in Support of Plaintiffs' Motion for Class Certification		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
412	4/5/2020	Declaration of Plaintiff #10 in Support of Plaintiffs' Motion for Class Certification		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
413	4/5/2020	Declaration of Plaintiff #14 in Support of Plaintiffs' Motion for Class Certification		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
414	4/5/2020	Declaration of Plaintiff #2 in Support of Plaintiffs' Motion for Class Certification		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
415	4/5/2020	Declaration of Plaintiff #4 in Support of Plaintiffs' Motion for Class Certification		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
416	4/5/2020	Declaration of Plaintiff #6 in Support of Plaintiffs' Motion for Class Certification		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
417	4/5/2020	Declaration of Plaintiff #7 in Support of Plaintiffs' Motion for Class Certification		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
418	4/5/2020	Declaration of Plaintiff #8 in Support of Plaintiffs' Motion for Class Certification		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
419	4/6/2020	Declaration of Plaintiff #5 in Support of Plaintiffs' Motion for Class Certification		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
420	9/23/2020	Declaration in Support of Plaintiffs' Opposition to Defendant's Motion for Summary Judgment, filed under seal at Dkt. No. 304-121		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
421	9/24/2020	Declaration in Support of Plaintiffs' Opposition to Defendant's Motion for Summary Judgment, filed under seal at Dkt. No. 304-122		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
422	9/24/2020	Declaration in Support of Plaintiffs' Opposition to Defendant's Motion for Summary Judgment, filed under seal at Dkt. No. 304-123		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
423	3/10/2014	Correspondence between LatinoJustice PRLDEF and Suffolk County, multiple dates	All Plaintiffs' Production - 000068 - All Plaintiffs' Production - 000097	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
424	7/18/2014	LatinoJustice PRLDEF's MV-15 Requests for DMV Records	All Plaintiffs' Production - 000247 - All Plaintiffs' Production - 000338	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
425	3/22/2016	Emails between F. Maer and Suffolk County officials, multiple dates	All Plaintiffs' Production - 000001 - All Plaintiffs' Production - 000067	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
426	3/22/2016	Emails between N. Trasande and Suffolk County officials, multiple dates	All Plaintiffs' Production - 000098 - All Plaintiffs' Production - 000246	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
427	3/9/2016	Plaintiff Identity List	P000002 - P000002	
428	5/16/2016	Collection Notice from EMA Recovery Services, Inc. to Plaintiff #2	Plaintiff 2 Production - 000183 - Plaintiff 2 Production - 000183	
429	Undated	Lt. D Meyers Business Card	Plaintiff 2 Production - 000175 - Plaintiff 2 Production - 000175	
430	Undated	Medical Records for Plaintiff #2	Plaintiff 2 Production - 000001 - Plaintiff 2 Production - 000174	
431	3/6/2016	Plaintiff #2 ELIH Medical Records		
432	2/26/2014	Plaintiff #13 Statement Form	Plaintiff #13 Investigation File 000001 - Plaintiff #13 Investigation File 000082	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.

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433	4/9/2014	Plaintiff #9 Statement Form	Plaintiff #9 Investigation File 000001 - Plaintiff #9 Investigation File 000026	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
434	5/22/2014	Plaintiff #8 Statement Form		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
435	12/14/2012	Traffic Records - Plaintiff #14	Plaintiff 14 Production - 000001 - Plaintiff 14 Production - 000007	
436	12/12/2013	Traffic Records - Plaintiff #15	Plaintiff 15 Production - 000004 - Plaintiff 15 Production - 000013	
437	7/13/2014	Traffic Records - Plaintiff #10	Plaintiff 10 Production - 000001 - Plaintiff 10 Production - 000015	
438	9/18/2014	Traffic Records - Plaintiff #6	Plaintiff 6 Production - 000004 - Plaintiff 6 Production - 000009	
439	10/8/2014	Traffic Records - Plaintiff #21	Plaintiff 21 Production - 000001 - Plaintiff 21 Production - 000003	
440	5/5/2015	Traffic Records - Plaintiff #8	Plaintiff 8 Production - 000001 - Plaintiff 8 Production - 000002	
441	7/23/2015	Traffic Records - Plaintiff #20	Plaintiff 20 Production - 000001 - Plaintiff 20 Production - 000034	
442	9/22/2015	Traffic Records - Plaintiff #7	Plaintiff 7 Production - 000001 - Plaintiff 7 Production - 000006	
443	3/16/2016	Traffic Records - Plaintiff #17	Plaintiff 17 Production - 000004 - Plaintiff 17 Production - 000027	
444	9/8/2014	UVISA Certification - Plaintiff #14	Plaintiff 14 Production - 000008 - Plaintiff 14 Production - 000010	
445	9/8/2014	UVISA Certification - Plaintiff #6	Plaintiff 6 Production - 000001 - Plaintiff 6 Production - 000003	
446	9/8/2014	UVISA Certification - Plaintiff #15	Plaintiff 15 Production - 000001 - Plaintiff 15 Production - 000003	
447	9/8/2014	UVISA Certification - Plaintiff #7	Plaintiff 7 Production - 000007 - Plaintiff 7 Production - 000009	
448	9/24/2014	UVISA Certification - Plaintiff #13	Plaintiff 13 Production - 000001 - Plaintiff 13 Production - 000003	
449	9/24/2014	UVISA Certification - Plaintiff #4	Plaintiff 4 Production - 000001 - Plaintiff 4 Production - 000003	
450	9/24/2014	UVISA Certification - Plaintiff #16	Plaintiff 16 Production - 000001 - Plaintiff 16 Production - 000003	
451	2/5/2015	UVISA Certification - Plaintiff #1	Plaintiff 1 Production - 000001 - Plaintiff 1 Production - 000003	
452	2/5/2015	UVISA Certification - Plaintiff #8	Plaintiff 8 Production - 000003 - Plaintiff 8 Production - 000005	
453	2/5/2015	UVISA Certification - Plaintiff #17	Plaintiff 17 Production - 000001 - Plaintiff 17 Production - 000003	
454	2/5/2015	UVISA Certification - Plaintiff #3	Plaintiff 3 Production - 000001 - Plaintiff 3 Production - 000003	
455	2/5/2015	UVISA Certification - Plaintiff #19	Plaintiff 19 Production - 000003 - Plaintiff 19 Production - 000005	
456	2/5/2015	UVISA Certification - Plaintiff #9	Plaintiff 9 Production - 000001 - Plaintiff 9 Production - 000003	
457	2/5/2015	UVISA Certification - Plaintiff #2	Plaintiff 2 Production - 000176 - Plaintiff 2 Production - 000178	
458	2/5/2015	UVISA Certification - Plaintiff #20	Plaintiff 20 Production - 000035 - Plaintiff 20 Production - 000037	
459	2/5/2015	UVISA Certification - Plaintiff #5	Plaintiff 5 Production - 000001 - Plaintiff 5 Production - 000003	
460	2/5/2015	UVISA Certification - Plaintiff #12	Plaintiff 12 Production - 000001 - Plaintiff 12 Production - 000003	
461	3/20/2015	UVISA Certification - Plaintiff #18	Plaintiff 18 Production - 000001 - Plaintiff 18 Production - 000003	

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462	11/15/2018	Supplement B, U Nonimmigrant Status Certification, Form I-918 for Plaintiff #13	Plaintiff 13 Production - 000009 - Plaintiff 13 Production - 000013	
463	11/15/2018	Supplement B, U Nonimmigrant Status Certification, Form I-918 for Plaintiff #8	Plaintiff 8 Production - 000010 - Plaintiff 8 Production - 000014	
464	11/15/2018	Supplement B, U Nonimmigrant Status Certification, Form I-918 for Plaintiff #4	Plaintiff 4 Production - 000004 - Plaintiff 4 Production - 000008	
465	11/15/2018	Supplement B, U Nonimmigrant Status Certification, Form I-918 for Plaintiff #14	Plaintiff 14 Production - 0000013 - Plaintiff 14 Production - 0000017	
466	11/15/2018	Supplement B, U Nonimmigrant Status Certification, Form I-918 for Plaintiff #15	Plaintiff 15 Production - 0000018 - Plaintiff 15 Production - 0000022	
467	11/15/2018	Supplement B, U Nonimmigrant Status Certification, Form I-918 for Plaintiff #9	Plaintiff 9 Production - 000008 - Plaintiff 9 Production - 000012	
468	Undated	Supplement B, U Nonimmigrant Status Certification, Form I-918 for Plaintiff #20	Plaintiff 20 Production - 000042 - Plaintiff 20 Production - 000046	
469	3/2/2016	Victim Impact Statement - Plaintiff #19	Plaintiff 19 Production - 000001 - Plaintiff 19 Production - 000002	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
470	4/22/2016	Victim Impact Statement - Plaintiff #13	Plaintiff 13 Production - 000004 - Plaintiff 13 Production - 000008	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
471	4/22/2016	Victim Impact Statement - Plaintiff #15	Plaintiff 15 Production - 000014 - Plaintiff 15 Production - 000017	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
472	4/25/2016	Victim Impact Statement - Plaintiff #8	Plaintiff 8 Production - 000006 - Plaintiff 8 Production - 000009	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
473	4/26/2016	Victim Impact Statement - Plaintiff #2	Plaintiff 2 Production - 000179 - Plaintiff 2 Production - 000182	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
474	4/26/2016	Victim Impact Statement - Plaintiff #9	Plaintiff 9 Production - 000004 - Plaintiff 9 Production - 000007	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
475	4/29/2016	Victim Impact Statement - Plaintiff #17	Plaintiff 17 Production - 000028 - Plaintiff 17 Production - 000031	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
476	4/29/2016	Victim Impact Statement - Plaintiff #3	Plaintiff 3 Production - 000004 - Plaintiff 3 Production - 000007	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
477	4/29/2016	Victim Impact Statement - Plaintiff #14	Plaintiff 14 Production - 000011 - Plaintiff 14 Production - 000012	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
478	4/29/2016	Victim Impact Statement - Plaintiff #6	Plaintiff 6 Production - 000010 - Plaintiff 6 Production - 000011	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
479	4/29/2016	Victim Impact Statement - Plaintiff #18	Plaintiff 18 Production - 000004 - Plaintiff 18 Production - 000006	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
480	4/29/2016	Victim Impact Statement - Plaintiff #20	Plaintiff 20 Production - 000038 - Plaintiff 20 Production - 000041	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
481	4/29/2016	Victim Impact Statement - Plaintiff #12	Plaintiff 12 Production - 000004 - Plaintiff 12 Production - 000008	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
482	4/30/2016	Victim Impact Statement - Plaintiff #7	Plaintiff 7 Production - 000010 - Plaintiff 7 Production - 000013	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
483	11/1/2001	Resolution titled "Bias-Free Policing Resolution," by the International Association of Chiefs of Police	Exhibit 102 to Plaintiffs' Opposition to Motion for Summary Judgment	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.

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484	6/21/2004	Dept. Directive Order 04-170	D 5/25/18 - 7 - D 5/25/18 - 8	
485	4/4/2014	SCPD Department Directive Order No. 14-76, Bias Incident Complaints	D-707 - D-708	
486	11/13/2014	SCPD General Order No. DRAFT, Department Early Warning - Early Intervention System	D-878 - D-883	
487	2/20/2015	SCPD General Order No. 15-10, No. 15-57: Department Early Warning – Early Intervention System	D 5/25/18 - 640 - D 5/25/18 - 646	
488	11/2/2015	Bias-Free Policing - SCPD General Order No. 15-52, Bias-Free Policing	D-5392 - D-5394	
489	1/19/2011	Rules and Procedures - Checkpoints, Ch. 9, § 20, Effective 01/09/2011	D-14331 - D-14335	
490	4/18/2007	SCPD General Order No. 07-25, Civilian Procedural Complaints	D-12568 - D-12572	
491	6/26/2007	SCPD Memorandum, Order No. 05-169a, Civilian Complaint Investigations – Report Format	D 5/25/18 - 598 - D 5/25/18 - 600	
492	6/16/2008	SCPD General Order No. 08-41, Civilian Complaint Procedure	D 5/25/18 - 533 - D 5/25/18 - 539	
493	1/27/2010	SCPD General Order No. 10-02, Civilian Complaint Procedure	D 5/25/18 - 542 - D 5/25/18 - 542	
494	1/27/2010	SCPD General Order No. 10-12, Civilian Complaint Procedure	D 5/25/18 - 544 - D 5/25/18 - 544	
495	8/3/2011	SCPD Memorandum, Order No. 05-169b, Civilian Complaint Investigations – Report Format	D 5/25/18 - 601 - D 5/25/18 - 603	
496	10/21/2011	SCPD General Order No. 11-58, Civilian Complaint Procedure	D 5/25/18 - 551 - D 5/25/18 - 562	
497	3/15/2012	SCPD Memorandum, Order No. 05-169c, Civilian Complaint Investigations – Report Format	D 5/25/18 - 604 - D 5/25/18 - 606	
498	4/10/2013	SCPD General Order No. 13-26, Civilian Complaint Procedure	D 5/25/18 - 563 - D 5/25/18 - 564	
499	9/10/2014	SCPD General Order No. 14-59, Civilian Complaint Procedure	D-20579 - D-20580	
500	Undated	SCPD General Order No. 92-1, Civilian Procedural Complaints	D-12575 - D-12578	
501	6/1/1992	SCPD General Order No. 92-1, Commanding Officer, Police Academy	D-11429 - D-11431	
502	3/8/2006	SCPD General Order No. 06-27, District Commander Duties and Responsibilities	D-12111 - D-12114	
503	10/31/2006	Command General Orders	9-18-2019_McLaughlinMB.00004876 - 9-18-2019_McLaughlinMB.00004887	
504	3/23/2007	SCPD General Order No. 07-14, Precinct Commander	D 5/25/18 - 405 - D 5/25/18 - 408	
505	1/4/2008	SCPD General Order No. 08-01, Commanding Officer Duties and Responsibilities	D-12090 - D-12095	
506	6/16/2008	SCPD General Order No. 08-41, Platoon Commander	D 5/25/18 - 337 - D 5/25/18 - 340	

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507	9/15/2008	9/15/2008 SCPD General Order No. 08-60, Command Duties and Responsibilities 12/17/2008 SCPD General Order No. 08-77, Command Duties and Responsibilities	D 5/25/18 - 909 - D 5/25/18 - 939	
508	1/26/2009	SCPD General Order No. 09-03, Platoon Commander	D-12290 - D-12293	
509	1/26/2009	SCPD General Order No. 09-04, Precinct Commander	D-12269 - D-12272	
510	4/9/2009	SCPD General Order No. 09-14, Command Duties and Responsibilities	D-12035 - D-12036	
511	5/14/2009	SCPD General Order No. 09-19, Command Duties and Responsibilities	D-12032 - D-12034	
512	8/10/2009	SCPD General Order No. 09-44, Command Duties and Responsibilities	D-12026 - D-12027	
513	11/12/2009	SCPD General Order No. 09-59, Commanding Officer Duties and Responsibilities	D-12085 - D-12089	
514	12/14/2009	SCPD General Order No. 09-65, Command Duties and Responsibilities	D-12022 - D-12023	
515	12/16/2009	SCPD General Order No. 09-67, Command Duties and Responsibilities	D-12020 - D-12021	
516	2/10/2011	SCPD General Order No. 11-08, District Commander Duties and Responsibilities	D-12107 - D-12110	
517	12/8/2011	SCPD General Order No. 11-74, Precinct Commander	D 5/25/18 - 413 - D 5/25/18 - 416	
518	3/22/2012	SCPD General Order No. 12-23, Precinct Commander	D 5/25/18 - 417 - D 5/25/18 - 419	
519	9/4/2012	SCPD General Order No. 12-55, District Commander Duties and Responsibilities	D-12104 - D-12106	
520	9/4/2012	9/4/2012 SCPD General Order No. 12-55, District Commander Duties and Responsibilities; 9/13/2012 SCPD General Order No. 12-58, District Commander Duties and Responsibilities	D-12100 - D-12103	
521	6/25/2013	SCPD General Order No. 13-44, District Commander Duties and Responsibilities	D-12096 - D-12099	
522	3/27/2014	SCPD General Order No. 14-17, Vehicular Crime Unit Investigative Duties	D-11867 - D-11870	
523	7/17/2014	SCPD General Order No. 14-41, Command Duties and Responsibilities	D 5/25/18 - 43 - D 5/25/18 - 45	
524	10/13/2014	SCPD General Order No. 15-02, Command Duties and Responsibilities	D 5/25/18 - 990 - D 5/25/18 - 995	
525	2/27/2015	SCPD General Order No. 15-14, Command Duties and Responsibilities	D-11849 - D-11851	
526	9/11/2015	SCPD General Order No. 15-45, Command Duties and Responsibilities	D-11843 - D-11844	
527	3/18/2016	SCPD General Order No. 16-22, Command Duties and Responsibilities	D 5/25/18 - 1007 - D 5/25/18 - 1010	
528	10/20/2017	SCPD General Order No. 17-54, Platoon Commander	D 5/25/18 - 346 - D 5/25/18 - 349	
529	11/29/2017	SCPD General Order No. 17-57, Command Duties and Responsibilities	D 5/25/18 - 1011 - D 5/25/18 - 1014	
530	3/23/2018	SCPD General Order No. 18-27, Command Duties and Responsibilities	D 5/25/18 - 1015 - D 5/25/18 - 1070	

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531	1/12/2016	1/12/2016 SCPD General Order No. 16-02, Command Duties and Responsibilities 1/20/2016 SCPD General Order No. 16-05, Command Duties and Responsibilities 1/21/2016 SCPD General Order No. 16-07, Command Duties and Responsibilities 1/22/2016 SCPD General Order No. 16-10, Command Duties and Responsibilities 2/11/2016 SCPD General Order No. 16-13, Command Duties and Responsibilities 3/2/2016 SCPD General Order No. 16-19, Command Duties and Responsibilities	D-11794 - D-11835	
532	1/12/2016	1/12/2016 SCPD General Order No. 16-02, Command Duties and Responsibilities 1/20/2016 SCPD General Order No. 16-05, Command Duties and Responsibilities 1/21/2016 SCPD General Order No. 16-07, Command Duties and Responsibilities 1/22/2016 SCPD General Order No. 16-10, Command Duties and Responsibilities 2/11/2016 SCPD General Order No. 16-13, Command Duties and Responsibilities 3/2/2016 SCPD General Order No. 16-19, Command Duties and Responsibilities 3/18/2016 SCPD General Order No. 16-22, Command Duties and Responsibilities 4/1/2016 SCPD General Order No. 16-30, Command Duties and Responsibilities 4/1/2016 SCPD General Order No. 16-43, Command Duties and Responsibilities 4/22/2016 SCPD General Order No. 16-49, Command Duties and Responsibilities 4/28/2016 SCPD General Order No. 16-50, Command Duties and Responsibilities 5/5/2016 SCPD General Order No. 16-52, Command Duties and Responsibilities 5/5/2016 SCPD General Order No. 16-54, Command Duties and Responsibilities 5/13/2016 SCPD General Order No. 16-66, Command Duties and Responsibilities 5/27/2016 SCPD General Order No. 16-69, Command Duties and Responsibilities	D-20555 - D-20564	
533	3/4/2011	3/4/2011 SCPD General Order No. 11-14, Commanding Officer Duties and Responsibilities 3/31/2011 SCPD General Order No. 11-21, Commanding Officer Duties and Responsibilities	D-12080 - D-12084	
534	11/10/2004	SCPD General Order No. 04-120, Discipline / Charges and Specifications - Sworn Members of the Department	D-12455 - D-12462	
535	3/11/2005	SCPD General Order No. 05-29, Command Discipline Procedure	D-12477 - D-12488	
536	10/26/2005	SCPD General Order No. 05-96, Discipline – Civilian Members of the Department	D-12500 - D-12504	
537	1/9/2008	SCPD General Order No. 08-06, Discipline / Charges and Specifications - Members of the Service	D-12446 - D-12452	
538	1/9/2008	SCPD General Order No. 08-07, Discipline – Civilian Members of the Department	D-12495 - D-12497	
539	6/26/2008	SCPD General Order No. 08-45, Discipline / Charges and Specifications - Members of the Service	D-12443 - D-12445	
540	6/26/2008	SCPD General Order No. 08-45, Discipline / Charges and Specifications - Members of the Service	D 5/25/18 - 647 - D 5/25/18 - 652	
541	6/26/2008	6/26/2008 SCPD General Order No. 08-46, Discipline – Civilian Members of the Department 10/14/2008 SCPD General Order No. 08-61, Discipline – Civilian Members of the Department	D-12489 - D-12493	
542	9/10/2008	SCPD General Order No. 08-56, Command Discipline Procedure	D-12474 - D-12474	
543	9/10/2008	SCPD General Order No. 08-56, Command Discipline Procedure	D-16334 - D-16346	
544	10/14/2008	SCPD General Order No. 08-61, Discipline – Civilian Members of the Department	D 5/25/18 - 663 - D 5/25/18 - 668	
545	6/14/2011	SCPD General Order No. 11-86, Command Discipline Procedure	D-12463 - D-12473	
546	5/10/2013	SCPD General Order No. 13-33, Discipline / Charges and Specifications – Members of the Service	D-12437 - D-12442	
547	5/13/2016	SCPD General Order No. 16-56, Discipline / Charges and Specifications – Members of the Service	D 5/25/18 - 655 - D 5/25/18 - 662	
548	12/17/2008	SCPD General Order No. 08-75, Hate Offenses	D 5/25/18 - 12 - D 5/25/18 - 15	

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549	10/21/2009	SCPD General Order No. 09-54, Hate Crimes	D 5/25/18 - 16 - D 5/25/18 - 24	
550	12/8/2011	SCPD General Order No. 11-75, Hate Crimes	D 5/25/18 - 42 - D 5/25/18 - 42	
551	4/1/2016	SCPD General Order No. 16-43, Hate Crimes	RPD_0016938 - RPD_0016955	
552	7/28/2017	SCPD General Order No. 17-40, Hate Crimes	D 5/25/18 - 81 - D 5/25/18 - 96	
553	4/29/2009	SCPD Memorandum Order No. 09-117, "Language Line" Translating and Interpreting Services	D-20766 - D-20766	
554	12/4/2009	SCPD General Order No. 09-63, Persons with Limited English Proficiency	D-20691 - D-20698	
555	2/9/2010	SCPD General Order No. 10-09, Persons with Limited English Proficiency	D 5/25/18 - 104 - D 5/25/18 - 105	
556	3/18/2010	SCPD General Order No. 10-58, Language Line Telephone Installation	D-20767 - D-20767	
557	3/26/2010	SCPD General Order No. 10-58, "Language Line" Translating and Interpreting Service	D-20768 - D-20769	
558	5/6/2010	SCPD General Order No. 10-06, Language Line Cellular Telephones	2016-06-06-DP00000557 - 2016-06-06-DP00000557	
559	6/7/2010	SCPD Memorandum Order No. 10-135, Availability of Spanish Language Department Forms	D-20772 - D-20772	
560	11/24/2010	SCPD Special Training Bulletin No. 10-16, Overcoming Barriers to Communicating/Limited English Proficiency	D-20753 - D-20755	
561	2/24/2011	SCPD General Order No. 11-13, Persons with Limited English Proficiency	D 5/25/18 - 106 - D 5/25/18 - 107	
562	3/4/2011	SCPD General Order No. 11-14, Persons with Limited English Proficiency	D-20703 - D-20705	
563	2/4/2012	SCPD Special Training Bulletin No. 10-16a, Overcoming Barriers to Communicating/Limited English Proficiency	D-20750 - D-20752	
564	2/10/2012	SCPD Special Training Bulletin No. 10-16b, Overcoming Barriers to Communicating/Limited English Proficiency	D-20747 - D-20749	
565	2/15/2012	SCPD General Order No. 10-58b, Language Line Services – Change in Initial Procedure	D-20770 - D-20771	
566	1/3/2014	SCPD Special Training Bulletin No. 14-02, Overcoming Barriers to Communicating/Limited English Proficiency	D-20765 - D-20765	
567	3/13/2014	SCPD Special Training Bulletin No. 14-02a, Overcoming Barriers to Communicating/Limited English Proficiency	D-20764 - D-20764	
568	4/10/2014	SCPD Forms Order No. 14-09, Interpretation Tracking	D-20739 - D-20740	
569	6/3/2014	SCPD Special Training Bulletin No. 14-02b, Overcoming Barriers to Communicating/Limited English Proficiency	D-20763 - D-20763	
570	8/25/2014	SCPD General Order No. 14-50, Suffolk County Police Department Language Access Plan	D-20729 - D-20738	
571	10/13/2014	SCPD Special Training Bulletin No. 14-02c, Overcoming Barriers to Communicating/Limited English Proficiency	D-20762 - D-20762	
572	12/4/2014	SCPD Special Training Bulletin No. 14-02d, Overcoming Barriers to Communicating/Limited English Proficiency	D-20761 - D-20761	
573	1/15/2015	Police Community Outreach Committee 01-15-15 First Quarter 2015	RPD_0015884 - RPD_0015886	
574	3/26/2015	SCPD Special Training Bulletin No. 14-02e, Overcoming Barriers to Communicating/Limited English Proficiency	D-20760 - D-20760	

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575	7/16/2015	SCPD Special Training Bulletin No. 14-02f, Overcoming Barriers to Communicating/Limited English Proficiency	D-20758 - D-20759	
576	8/4/2015	SCPD General Order No. 15-32, Persons with Limited English Proficiency	D 5/25/18 - 112 - D 5/25/18 - 113	
577	8/4/2015	SCPD General Order No. 15-32, Language Access Plan and Policy	D-12636 - D-12637	
578	9/23/2015	SCPD Forms Ordere No. 15-12, Language Assistance Tracking	D-20745 - D-20746	
579	10/14/2015	SCPD Forms Order No. 15-12a, Language Assistance Tracking	D-20742 - D-20743	
580	11/13/2015	SCPD Special Training Bulletin No. 14-02g, Overcoming Barriers to Communicating/Limited English Proficiency	D-20757 - D-20757	
581	12/4/2015	SCPD General Order No. 15-59, Community Relations Function	D-20678 - D-20689	
582	12/4/2015	SCPD General Order No. 15-60, Language Access Plan and Policy	D-12616 - D-12635	
583	12/4/2015	SCPD General Order No. 15-60, Language Access Plan and Policy	RPD_0015693 - RPD_0015712	
584	12/4/2015	SCPD General Order No. 15-56, Civilian Complaint Procedure	D-5464 - D-5476	
585	2/9/2016	SCPD Special Training Bulletin No. 14-02h, Overcoming Barriers to Communicating/Limited English Proficiency	D-20756 - D-20756	
586	3/10/2016	SCPD Patrol Division Memorandum re: Language Assistance Tracking - Use of Interpreters and Reporting	RPD_0016869 - RPD_0016869	
587	4/18/2016	SCPD Memorandum Order No. 16-112, Language Assistance Tracking	RPD_0016868 - RPD_0016868	
588	4/26/2016	SCPD Memorandum Order No. 16-120, Language Access Plan Clarifications	D-20774 - D-20774	
589	3/2/2018	SCPD General Order No. 18-17, Language Access Plan and Policy	D 5/25/18 - 155 - D 5/25/18 - 171	
590	3/16/2006	SCPD General Order No. 06-34, Police Mission	D 5/25/18 - 172 - D 5/25/18 - 174	
591	6/3/2006	SCPD General Order No. 05-64, Legal Structure	D-11727 - D-11729	
592	9/15/2008	9/15/2008 SCPD General Order No. 08-60, Organizational Structure 12/17/2008 SCPD General Order No. 08-76, Organizational Structure	D-11730 - D-11736	
593	4/9/2009	SCPD General Order No. 09-13, Organizational Structure	D-11737 - D-11737	
594	7/30/2009	SCPD General Order No. 09-38, Organizational Structure	D-11738 - D-11739	
595	8/10/2009	SCPD General Order No. 09-43, Organizational Structure	D-11740 - D-11741	
596	12/14/2009	SCPD General Order No. 09-64, Organizational Structure	D-11742 - D-11743	
597	12/16/2009	SCPD General Order No. 09-66, Organizational Structure	D-11744 - D-11745	
598	6/9/2010	SCPD General Order No. 10-20, Organizational Structure	D-11746 - D-11747	
599	11/17/2011	SCPD General Order No. 11-69, Organizational Structure	D-11749 - D-11755	
600	8/31/2012	SCPD General Order No. 12-54, Organizational Structure	D-11759 - D-11760	
601	11/29/2012	SCPD General Order No. 12-63, Organizational Principles	D-12121 - D-12122	
602	2/21/2013	SCPD General Order No. 13-08, Special Boards	D 5/25/2018 - 226 - D 5/25/2018 - 231	

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603	4/1/2013	SCPD General Order No. 13-13, Organizational Structure	D-11761 - D-11763	
604	4/11/2013	SCPD General Order No. 13-28, Organizational Structure	D-11764 - D-11770	
605	10/13/2014	SCPD General Order No. 15-01, Organizational Structure	D-11774 - D-11775	
606	1/12/2016	1/12/2016 SCPD General Order No. 16-01, Organizational Structure 1/20/2016 SCPD General Order No. 16-04, Organizational Structure 1/21/2016 SCPD General Order No. 16-06, Organizational Structure 1/22/2016 SCPD General Order No. 16-09, Organizational Structure 1/22/2016 SCPD General Order No. 16-09a, Organizational Structure 3/2/2016 SCPD General Order No. 16-18, Organizational Structure	D-11786 - D-11793	
607	7/15/2016	SCPD General Order No. 16-74, Police Mission	D 5/25/18 - 178 - D 5/25/18 - 181	
608	8/17/2017	SCPD General Order No. 17-41, Police Mission	D 5/25/18 - 182 - D 5/25/18 - 184	
609	Undated	SCPD General Order No. 92-1, Organizational Principles	D-12123 - D-12124	
610	1/21/2004	SCPD General Order Nos. 04-14 and 04-15, Skills, Knowledge and Abilities Inventory	D-12605 - D-12606	
611	1/5/2005	SCPD General Order No. 05-003, Personnel Selection	D-12595 - D-12596	
612	6/16/2008	SCPD General Order No. 08-41, Authorized Abbreviations	D 5/25/18 - 840 - D 5/25/18 - 845	
613	6/16/2008	SCPD General Order No. 08-41, Notice of Claim	D 5/25/18 - 717 - D 5/25/18 - 718	
614	2/2/2010	SCPD General Order No. 10-05, Members of the Service Promotional Criteria	D-12592 - D-12594	
615	10/28/2011	SCPD General Order No. 11-63, Required Notifications to Complainant/Victim in Criminal Investigations	D-20675 - D-20677	
616	11/4/2011	SCPD General Order No. 11-65, Hate Crimes	D 5/25/18 - 27 - D 5/25/18 - 41	
617	11/15/2011	SCPD General Order No. 11-67, Notice of Claim	D 5/25/18 - 719 - D 5/25/18 - 721	
618	1/30/2012	SCPD General Order No. 12-03, Completion of Memorandum Books	D 5/25/18 - 243 - D 5/25/18 - 244	
619	3/15/2013	3/15/2013 SCPD General Order No. 13-11, Written Directives 4/18/2013 SCPD General Order No. 13-29, Written Directives 10/1/2013 SCPD General Order No. 13-63, Written Directives	D-914 - D-927	
620	6/25/2013	SCPD General Order No. 13-53, Field Training Program	D-11412 - D-11418	
621	6/25/2013	SCPD General Order No. 13-53, Specialized, Advanced, Remedial and Technical Training	D-11419 - D-11424	
622	8/1/2013	Suffolk County Standard Operating Procedure Litigation Hold-Preservation	D-12320 - D-12325	
623	9/18/2013	Stipulation of Agreement between The County of Suffolk and Suffolk County Association of Municipal Employees - Bargaining Units No. 2 and 6	D-21586 - D-21589	
624	10/24/2013	SCPD General Order No. 13-69, Rank and Tours of Duty	D-12115 - D-12117	
625	1/13/2014	SCPD Personnel Order No. [No number assigned], Designation of Compliance Coordinator (DOJ / SCPD)	D-94 - D-95	

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626	6/27/2014	SCPD General Order No. 14-40, Arrest of Non-U.S. Citizens and Persons with Dual Citizenship	D-20602 - D-20610	
627	8/4/2014	Suffolk County / Office of the County Executive Standard Operating Procedure (SOP), No. B-07, Policy of Nondiscrimination in County Services and Service Discrimination Complaint Procedures	D-12655 - D-12671	
628	1/9/2015	SCPD General Order No. 15-07, Arrest of Non-U.S. Citizens and Persons with Dual Citizenship	D-20611 - D-20612	
629	4/24/2015	SCPD General Order No. 15-23, Arrest of Non-U.S. Citizens and Persons with Dual Citizenship	D-20613 - D-20613	
630	12/4/2015	SCPD General Order No. 15-61, Decentralized Individualized In-Service Training (D.I.I.T.)	D-11435 - D-11439	
631	12/4/2015	SCPD General Order No. 15-61, Training Committee	D-11407 - D-11411	
632	4/1/2016	SCPD General Order No. 16-43, Arrest of Non-U.S. Citizens and Persons with Dual Citizenship	D-20614 - D-20621	
633	4/4/2017	Contract Between SCPD and Lexipol	RPD_0018695 - RPD_0018720	
634	10/20/2017	SCPD General Order No. 17-54, Authorized Abbreviations	D 5/25/18 - 859 - D 5/25/18 - 865	
635	10/20/2017	SCPD General Order No. 17-54, Daily Journal & Blotter Changed – Electronic Blotters	D 5/25/18 - 881 - D 5/25/18 - 886	
636	1/1/2019	2019 Contract Between SCPD and Lexipol, 2019	RPD_0018721 - RPD_0018734	
637	Undated	SCPD General Order No. 92-1, Crime Prevention Function	D-12298 - D-12299	
638	Undated	SCPD General Order No. 92-1, Performance Evaluation System	D-12579 - D-12588	
639	4/25/2007	SCPD General Order No. 07-32, Police Officer Duties and Responsibilities	D-12068 - D-12069	
640	2/1/2008	SCPD General Order No. 08-18, Memorandum Books	D 5/25/18 - 199 - D 5/25/18 - 205	
641	6/16/2008	SCPD General Order No. 08-18, Motor Vehicle Crash Reporting	D 5/25/18 - 866 - D 5/25/18 - 873	
642	7/17/2008	SCPD General Order No. 08-53, Police Officer – Specific Duties	D 5/25/18 - 350 - D 5/25/18 - 358	
643	7/24/2009	SCPD General Order No. 09-27, Police Officer Duties and Responsibilities	D-12070 - D-12072	
644	1/25/2010	Suffolk County Police Department Police Academy Bureau Training Unit, January 2010 mobile needs-based training for the desk officer supervisor in service	D-15419 - D-15470	
645	3/29/2010	SCPD General Order No. 10-16, Police Officer – Specific Duties	D 5/25/18 - 361 - D 5/25/18 - 363	
646	6/14/2011	SCPD General Order No. 11-66, Memorandum Books / Electronic Record of Activity	D 5/25/18 - 206 - D 5/25/18 - 217	
647	6/14/2011	SCPD General Order No. 11-86, Memorandum Books / Electronic Record of Activity	D 5/25/18 - 368 - D 5/25/18 - 379	
648	10/21/2011	SCPD General Order No. 11-56, Police Officer – Specific Duties	D 5/25/18 - 367 - D 5/25/18 - 367	
649	11/4/2011	SCPD General Order No. 11-64, Department Early Warning – Early Intervention System	D-12515 - D-12518	
650	12/8/2011	SCPD General Order No. 11-85, Traffic Stop Data Collection	D 5/25/18 - 425 - D 5/25/18 - 428	
651	1/30/2012	SCPD General Order No. 12-40, Memorandum Books/Daily Record of Activity	D 5/25/18 - 218 - D 5/25/18 - 225	
652	4/19/2012	SCPD General Order No. 12-26, Department Early Warning – Early Intervention System	D-12513 - D-12514	
653	7/23/2012	Roadway Checkpoint Report, C.C. #2012-0457150	D-13493 - D-13493	
654	7/27/2012	SCPD General Order No. 12-47, Standards of Supervision	D-12078 - D-12079	
655	7/27/2012	SCPD General Order No. 12-50, Desk Supervisor – Specific Duties	D-12184 - D-12188	

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656	2/21/2013	SCPD General Order No. 13-06, Precinct Executive Officer	D-12280 - D-12281	
657	2/21/2013	SCPD General Order No. 13-07, Precinct Administrative Supervisor	D-12286 - D-12287	
658	3/15/2013	SCPD General Order No. 13-10, Desk Supervisor – Specific Duties	D-12179 - D-12183	
659	4/21/2014	Order No. 14-08, Patrol Division Memorandum from John Meehan, Chief of Patrol re: Points to remember regarding the Traffic Stop Program	D-2028 - D-2030	
660	4/25/2014	SCPD General Order No. 14-23, Police Officer – Specific Duties	D-12125 - D-12134	
661	4/25/2014	SCPD General Order No. 14-24, Desk Supervisor – Specific Duties	D-12173 - D-12178	
662	4/25/2014	SCPD General Order No. 14-25, Precinct Executive Officer	D-12277 - D-12279	
663	4/25/2014	SCPD General Order No. 14-26, Precinct Administrative Supervisor	D-12284 - D-12285	
664	7/15/2014	SCPD General Order No. 14-55, Memorandum Books/Daily Record of Activity	D 5/25/18 - 232 - D 5/25/18 - 233	
665	9/4/2014	SCPD General Order No. 14-56, Memorandum Books/Daily Record of Activity	D 5/25/18 - 234 - D 5/25/18 - 234	
666	1/9/2015	SCPD General Order No. 15-03, Memorandum Books / Daily Record of Activity	D 5/25/18 - 235 - D 5/25/18 - 242	
667	1/9/2015	SCPD General Order No. 15-06, Patrol Supervisor Duties and Responsibilities	D 5/25/18 - 294 - D 5/25/18 - 295	
668	8/28/2015	SCPD General Order No. 15-39, Patrol Supervisor Duties and Responsibilities	D 5/25/18 - 297 - D 5/25/18 - 299	
669	12/4/2015	Rules and Procedures - Civilian Complaint Procedure, Ch. 5, § 2, Effective 12/04/2015	D 5/25/18 - 567 - D 5/25/18 - 579	
670	12/4/2015	Updated Directive	D-12505 - D-12510	
671	2/26/2016	SCPD General Order No. 16-16, Patrol Supervisor Duties and Responsibilities	D-12194 - D-12209	
672	2/24/2017	SCPD General Order No. 17-06, Patrol Supervisor Duties and Responsibilities	D 5/25/18 - 308 - D 5/25/18 - 319	
673	4/28/2017 6/9/2017	4/28/2017 SCPD General Order No. 17-21, Police Officer – Specific Duties 6/9/2017 SCPD General Order No. 17-36, Police Officer – Specific Duties	D 5/25/18 - 394 - D 5/25/18 - 404	
674	8/17/2017	SCPD General Order No. 17-42, Bias-Free Policing	D 5/25/18 - 1 - D 5/25/18 - 3	
675	12/11/2017	SCPD General Order No. 18-23, Patrol Supervisor Duties and Responsibilities	D 5/25/18 - 325 - D 5/25/18 - 336	
676	3/2/2018	SCPD Technology Training Bulletin	D 5/25/18 - 482 - D 5/25/18 - 485	
677	3/12/2018	Suffolk County Police Department General Order Number 18-18	D 5/25/18 - 527 - D 5/25/18 - 532	
678	3/15/2019	SCPD Organizational Chart		
679	10/20/2017 11/29/2017	10/20/2017 SCPD General Order No. 17-54, Motor Vehicle Crash Reporting 11/29/2017 SCPD General Order No. 17-59, Motor Vehicle Crash Reporting	D 5/25/18 - 887 - D 5/25/18 - 896	
680	7/21/2006	SCPD General Order No. 06-56, Miscellaneous Regulations	D-12413 - D-12414	
681	12/17/2008	SCPD General Order No. 08-74, Miscellaneous Regulations	D-12406 - D-12407	
682	10/28/2011	SCPD General Order No. 11-61, Miscellaneous Regulations	D-12401 - D-12402	
683	5/19/2008	SCPD General Order No. 08-34, Roadway Checkpoints SCPD General Order No. 08-64, Roadway Checkpoints	D-14338 - D-14341	

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684	1/19/2011	SCPD General Order No. 11-02, Roadway Checkpoints	D 5/25/18 - 525 - D 5/25/18 - 526	
685	11/23/2005	11/23/2005 SCPD General Order No. 05-108, Rules of Conduct 12/8/2005 SCPD General Order No. 05-114, Rules of Conduct 1/4/2006 SCPD General Order No. 06-01, Rules of Conduct	D-12365 - D-12379	
686	7/6/2006	SCPD General Order No. 06-53, Rules of Conduct	D-12361 - D-12362	
687	11/13/2007	SCPD General Order No. 07-90, Rules and Procedures, Familiarization / Enforcement	D-11723 - D-11724	
688	1/9/2008	SCPD General Order No. 08-05, Rules of Conduct	D-12344 - D-12348	
689	2/24/2011	SCPD General Order No. 11-13, Persons with Limited English Proficiency SCPD General Order No. 11-14, Persons with Limited English Proficiency	11-25-2019_SelectedMessages.00000769 - 11-25-2019_SelectedMessages.00000784	
690	6/25/2013	SCPD General Order No. 13-51 - Rules and Procedures	11-25-2019_SelectedMessages.00000757 - 11-25-2019_SelectedMessages.00000768	
691	11/7/2014	SCPD General Order No. 14-63, Rules of Conduct – Members of the Department	D 5/25/18 - 681 - D 5/25/18 - 692	
692	12/9/2014	Draft of SCPD General Order No. 14-63, Rules of Conduct – Members of the Department	D-677 - D-693	
693	2/16/2015	Lesson Plan	RPD_0018619 - RPD 0018620	
694	10/2/2015	SCPD General Order No. 15-48, Rules and Procedures Manual No Longer Required – be Maintained by Members of the Department	D-11838 - D-11842	
695	10/2/2015	10/2/2015 SCPD General Order No. 15-48, Rules and Procedures, Familiarization / Enforcement 12/4/2015 SCPD General Order No. 15-55, Rules and Procedures, Familiarization / Enforcement	D-11725 - D-11726	
696	7/15/2016	SCPD General Order No. 16-75, Rules of Conduct – Members of the Service	D 5/25/18 - 698 - D 5/25/18 - 698	
697	2/7/2018	SCPD General Order No. 18-10, Rules of Conduct – Members of the Service	D 5/25/18 700 - D 5/25/18 716	
698	Undated	SCPD Rules and Procedures Chapters 2 & 5, multiple dates	9-18-2019_McLaughlinMB.00004947 - 9-18-2019_McLaughlinMB.00005138	
699	9/30/2013	SCPD Memorandum, Order No. 13-219, Training Announcement – DCJS Training – "Conducting Complete Traffic Stops"	D 5/25/18 - 478 - D 5/25/18 - 478	
700	3/19/2010	SCPD General Order 10-12, Civilian Complaint Procedure	D 5/25/18-544 - D 5/25/18-544	
701	1/12/2018	SCPD General Order 18-03, Civilian Complaint Procedure	D 5/25/18-583 - D 5/25/18-597	
702	11/9/2001	SCPD General Order No. 01-64, Standards of Supervision	D-12073 - D-12075	
703	3/23/2007	SCPD General Order No. 07-13, Desk Supervisor – Specific Duties	D-12189 - D-12193	
704	6/16/2008	SCPD General Order No. 08-41, Patrol Supervisor Duties and Responsibilities	D 5/25/18 - 245 - D 5/25/18 - 256	
705	1/26/2009	SCPD General Order No. 09-02, Patrol Supervisor	D 5/25/18 - 257 - D 5/25/18 - 258	
706	3/4/2011	SCPD General Order No. 11-14, Duty Officer Transition to Public Safety Dispatcher III (Communications Section Supervisor)	D-11955 - D-12012	
707	4/19/2012	SCPD General Order No. 12-27, Patrol Supervisor Duties and Responsibilities	D 5/25/18 - 277 - D 5/25/18 - 280	
708	2/10/2022	Suffolk County Charter		
709	Undated	SCPD General Order No. 92-1, Precinct Administrative Supervisor – Specific Duties	D-12288 - D-12289	
710	2/21/2005	SCPD Special Order No. 05-08, Vehicle Traffic Stops	D 5/25/18 - 467 - D 5/25/18 - 472	
711	9/22/2006	SCPD Forms Order No. 06-17, Traffic Stop Data Collection	D 5/25/18 - 475 - D 5/25/18 - 475	
712	1/26/2009	SCPD General Order No. 09-01, Traffic Stop Data Collection	D 5/25/18 - 420 - D 5/25/18 - 424	

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713	3/19/2010	SCPD General Order No. 10-13, Vehicle Traffic Stops	D 5/25/18 - 486 - D 5/25/18 - 494	
714	8/3/2010	SCPD General Order No. 10-33, Vehicle Traffic Stops	D 5/25/18 - 495 - D 5/25/18 - 496	
715	11/28/2011	SCPD Forms Order No. 06-17a, Traffic Stop Data Collection	D 5/25/18 - 477 - D 5/25/18 - 477	
716	4/1/2013	SCPD General Order No. 13-21, Traffic Stop Data Collection	D 5/25/18 - 441 - D 5/25/18 - 450	
717	3/6/2014	Email from scpd-directives@suffolkcountyny.gov to scpd-directives@suffolkcountyny.gov re: DTB 14-05 Summary of Department Directives for Monthly Inspections, attaching Monthly Training Bulletin	9-18-2019_Capolino.00000306 - 9-18-2019_Capolino.00000308	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection; Relevance
718	9/4/2014	SCPD General Order No. 14-54, Traffic Stop Data Collection	D-774 - D-775	
719	1/26/2015	1/26/2015 SCPD General Order No. 15-09, Vehicle Traffic Stops 9/25/2015 SCPD General Order No. 15-47, Vehicle Traffic Stops	D 5/25/18 - 499 - D 5/25/18 - 510	
720	10/2/2018	Amended and Restated Consent Decree Regarding the New Orleans Police Department, <i>United States of America v. City of New Orleans</i> , No. 12-cv-01924 (E.D. La. Oct. 2, 2018)		Objection - Hearsay; Relevance
721	9/1/2018	Current Organizational Chart of SCPD		
722	1/1/2001	PDF titled "Principles for Promoting Police Integrity: Examples of Promising Police Practices and Policies," published by the Department of Justice		Objection - Hearsay
723	1/4/2005	S. Walker & C. Archbold, The New World of Police Accountability, Chapter 5: Early Intervention Systems		Objection - Hearsay
724	7/10/2006	Article titled "Cops target profiling, To guage whether minorities are singled out, Suffolk officers are recording the races of drivers the stop," published by Newsday		Objection - Hearsay
725	9/1/2006	"Protecting Civil Rights: A Leadership Guide for State, Local, and Tribal Law Enforcement," by the International Association of Chiefs of Police		Objection - Hearsay
726	3/22/2007	Article titled "Suffolk's letter of the law: After rejecting anti-loitering bill, lawmakers say police should better enforce existing state laws," published by Newsday		Objection - Hearsay
727	9/1/2009	Report titled "Climate of Fear: Latino Immigrants in Suffolk County, N.Y.," published by the Southern Poverty Law Center	6-20-19 Love DOJ Correspondence SC 007802 - 6-20-19 Love DOJ Correspondence SC 007829	Objection - Hearsay
728	12/3/2013	Press Release titled "United States Agrees to Comprehensive Settlement to Resolve its Investigation of the Suffolk County Police Department for Discriminatory Policing Against Latinos," issued by the United States Department of Justice	11-25-2019_SelectedMessages.00001376 - 11-25-2019_SelectedMessages.00001377	Objection - Hearsay
729	6/24/2014	Article titled "Scott Greene, ex-Suffolk police sergeant accused of stealing from Latinos, faces 60 more counts," published by Newsday		Objection - Hearsay
730	10/6/2015	PDF titled "Attorney General Loretta E. Lynch Delivers Opening Remarks at the Congressional Hispanic Caucus Institute Leadership Luncheon," published by the United States Department of Justice		Objection - Hearsay
731	10/27/2015	Article titled "Suffolk Police Chief James Burke Retires Amid Federal Probe," published by CBS New York		Objection - Hearsay; Relevance; Prejudice
732	12/1/2015	Unbiased Policing: Model Policy published by the IACP Law Enforcement Policy Center		Objection - Hearsay
733	12/1/2015	Concepts and Issue Paper titled "Unbiased Policing," published by IACP Law Enforcement Center		Objection - Hearsay
734	2/29/2016	Article titled "Suffolk Struggles to Reform Discriminatory Policing Against Latinos," published by WSHU Public Radio		Objection - Hearsay
735	5/19/2016	Article titled "Former Suffolk Sgt. Sentenced for Stealing Drivers' Cash," published by Newsday		Objection - Hearsay
736	8/19/2016	Article titled "The Organizational Reasons Police Departments Don't Change," published by Harvard Business Review		Objection - Hearsay
737	2/12/2017	Article titled "Suffolk's former chief of patrol to become Brookhaven's safety boss," published by Newsday		Objection - Hearsay
738	4/24/2017	Human Rights Commission Questions re: Bias Policing	8_26_2019_Love_00000001.00000009.00012592 - 8_26_2019_Love_00000001.00000009.00012592	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection
739	4/24/2017	Suffolk County Human Rights Commission: Public Meeting with Police Commissioner Timothy Sini	8_26_2019_Love_00000001.00000009.00012588 - 8_26_2019_Love_00000001.00000009.00012588	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection
740	6/16/2017	Memo from T. Sini to U.S. House of Representatives, Committee on Homeland Security, Subcommittee on Counterterrorism and Intelligence re: Testimony Regarding MS-13		Objection - Hearsay; Relevance
741	1/1/2018	U.S. Census Bureau QuickFacts: Suffolk County, New York		Objection - Hearsay
742	1/1/2018	Webpage titled "Suffolk County, NY," published by Census Reporter		Objection - Hearsay
743	1/1/2018	Webpage titled "Training," published by Fair & Impartial Policing		Objection - Hearsay
744	2/22/2018	Article titled "Geraldine Hart Nominated Suffolk Police Commissioner," published by Long Island Business News		Objection - Hearsay
745	4/17/2018	Organizational Charts of SCPD (2008-2018)	D 5/25/18 - 1071 - D 5/25/18 - 1116	

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746	9/28/2018	Article titled "Challenged by Long Island Lawmakers, Police Will Look Into Treatment of Immigrant Families Who Reported Missing Children," published by ProPublica		Objection - Hearsay; Relevance
747	6/26/2019	Report titled "Complaints of Biased Policing in New York City: An Assessment of NYPD's Investigations, Policies, and Training," published by New York City Department of Investigation		Objection - Hearsay; Relevance
748	9/20/2019	Article titled "The Politics of Corruption on Long Island: Ex-Suffolk County Police Chief James Burke," published by A.M.N.Y.		Objection - Hearsay; Relevance
749	11/26/2019	Article titled "Key Witness in Ex-Suffolk DA Corruption Trial Testifies to 'Culture of Paranoia,' Retaliation," published by New York Law Journal		Objection - Hearsay, relevance, Prejudice
750	12/17/2019	Press Release titled "Former Suffolk County District Attorney Thomas J. Spota and Government Corruption Bureau Chief Christopher McPartland Convicted of Obstructing a Federal Civil Rights Investigation," published by the United States Department of Justice		Objection - Hearsay, relevance, Prejudice
751	1/1/2020	Webpage titled "Public Safety," published by Suffolk County Government		
752	1/1/2020	PDF titled "2020 Adopted Operating Budget Narrative Summary, Volume 1," published by County of Suffolk		
753	9/18/2020	Article titled "Suffolk police face \$20M cut amid fiscal crisis, county executive says," published by New York Post		Objection - Hearsay; Relevance
754	Undated	Report titled "Building Trust Between the Police and the Citizens They Serve: An Internal Affairs Promising Practices Guide for Local Law Enforcement," published by U.S. Department of Justice: Office of Community Oriented Policing Service		Objection - Hearsay
755	Undated	Webpage titled "Suffolk County Police Department," published by Civil Service Success		Objection - Hearsay
756	11/1/2000	"A Resource Guide on Racial Profiling Data Collection Systems: Promising Practices and Lessons Learned," published by the U.S. Department of Justice		Objection - Hearsay
757	1/18/2017	Report titled "San Jose Police Department Traffic and Pedestrian Stop Study," by Michael R. Smith et al., published by the Center for Law and Human Behavior at the University of Texas at El Paso		Objection - Hearsay, Relevance; Prejudice
758	10/12/2017	Letter from D. Brown to K. Brennan re: Plaintiffs #1-21 v. Count of Suffolk, et al, Docket No.: 15-CV-2431		Objection - Hearsay
759	1/1/2003	Early Intervention Systems for Law Enforcement Agencies: A Planning and Management Guide, published by the U.S. Dept. of Justice		Objection - Hearsay
760	5/4/2007	Article titled "Police Nix Policy," published by Newsday		Objection - Hearsay
761	12/18/2013	Article titled "For Their Eyes Only: Police Misconduct Hidden from Public by Secrecy Law, Weak Oversight," published by Newsday		Objection - Hearsay
762	11/2/2016	Article titled "James Burke, Ex-Suffolk County Police Chief, is Sentenced to 46 Months," published by The New York Times		Objection - Hearsay
763	4/10/2019	Article titled "Former Suffolk Chief of Police James Burke to complete prison sentence Thursday, records show," published by Newsday		Objection - Hearsay, Relevance; Prejudice
764	1/1/2014	2014 Indictment In The People of the State of New York vs. Scott A. Greene, Case No.: I-1397-2014		
765	3/12/2014	New York v. Greene, No. 618-14, Grand Jury Minutes	10/30/18 SC 106 - 10/30/18 SC 166	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
766	6/2/2014	New York v. Greene, No. 1397-14, Grand Jury Minutes	10/30/18 SC 235 - 10/30/18 SC 299	Objection - Hearsay, No objection for purposes of impeachment or to refresh recollection.
767	6/3/2014	New York v. Greene, No. 618-14, Grand Jury Minutes	10/30/18 SC 300 - 10/30/18 SC 404	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
768	6/10/2014	New York v. Greene, No. 618-14, Grand Jury Minutes	10/30/18 SC 405 - 10/30/18 SC 454	Objection - Hearsay, No objection for purposes of impeachment or to refresh recollection.
769	1/6/2016	New York v. Greene, No. 618-14, Trial Transcript		Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
770	1/7/2016	New York v. Greene, No. 618-14, Trial Transcript		Objection - Hearsay, No objection for purposes of impeachment or to refresh recollection.
771	5/19/2016	Hearing Transcript - Sentencing Minutes for Scott Greene		
772	5/28/2019	Scott Greene Answer to Plaintiffs' Complaint		
773	Undated	New York v. Greene, No. 618-14, Denovo Indictment		
774	Undated	New York v. Greene, No. I-1397-2014, Denovo Indictment		
775	Undated	New York v. Greene, No. 618-14, Denovo Indictment (signed)		
776	2/13/1989	Document: Concise Officer History for Scott Greene	10.30.19 SC 000042 - 10.30.19 SC 000043	

**Plaintiffs #1-21 v. County of Suffolk, et al.
Case No. 15-cv-2431 (E.D.N.Y.)
PLAINTIFFS' TRIAL EXHIBIT LIST**

Temp. Doc. ID#	Date	Description	Bates Range	Objections
777	12/14/2015	Series of photocopied notebook pages	Caldarelli Deposition Exhibit 4	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
778	Undated	Notes from September 4, 2013 through March 10, 2014	D-20851 - D-20904	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
779	Undated	Scott Greene handwritten Memo Book Pages, multiple dates	Plaintiff #1 Investigation File 000001 - Plaintiff #1 Investigation File 000032	
780	Undated	Scott Greene handwritten Memo Book Pages, multiple dates	Plaintiff #20 Investigation File 000001 - Plaintiff #20 Investigation File 000041	
781	2/14/2014	Article titled "Victims of Alleged Racial Profiling by Long Island Police Sergeant Come Forward," published by NBC		Objection - Hearsay
782	Undated	Compilation of Scott Greene Incident Data and Notes	D-20849 - D-20951	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
783	1/3/2012	MDC Name Entries	2019.10.30 PROD0008 - MDC - 2019.10.30 PROD0008 - MDC	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
784	7/14/2014	SCPD July 2014 Compliance Report, with attachments	D-1924 - D-2236	
785	1/1/2015	2015 IAB Annual Report: Patterns & Trends of Biased Policing Report	RPD_0015602 - RPD_0015610	
786	1/8/2015	SCPD Analysis of Biased Policing Complaints: July 1, 2014 - December 31, 2014	D-1127 - D-1128	
787	1/13/2015	SCPD January 13, 2015 Compliance Report, with attachments	D-945 - D-1304	
788	6/23/2015	SCPD Analysis of Biased Policing Complaints: January - June 2015		
789	8/1/2015	August 1, 2015 Compliance Report, with attachments	D-2288 - D-2549	
790	1/1/2016	Internal Affairs Bureau - Biased Policing Complaints 1/1/16-6/30/16		
791	1/1/2016	SCPD Community Relations Report 2016, with attachments		
792	1/1/2016	2016 SCPD Annual Report on Biased Based Policing	RPD_0016776 - RPD_0016793	
793	2/15/2016	February 15, 2016 SCPD Compliance Report	4-19-19 SC 1 - 4-19-19 SC 48	
794	2/15/2016	Email from C. Love to J. Mondino, M. Goldberger, et al. re: Compliance Report Attachments (1-8), attaching Attachments #1-8 of the February 15, 2016 SCPD Compliance Report	6-20-19 Love DOJ Correspondence SC 008876 - 6-20-19 Love DOJ Correspondence SC 008926	Objection - Hearsay; No objection for purposes of impeachment or to refresh recollection.
795	7/15/2016	July 15, 2016 SCPD Compliance Report, with attachments	6-20-19 Love DOJ Correspondence SC 010773 - 6-20-19 Love DOJ Correspondence SC 010946	
796	1/1/2017	2017 SCPD Annual Report on Biased Policing Complaints	RPD_0016987 - RPD_0017000	
797	3/1/2017	SCPD Community Relations Report 2017	RPD_0017001 - RPD_0017069	
798	3/1/2017	March 1, 2017 SCPD Compliance Report, with attachments	RPD_0016794 - RPD_0016838	
799	1/1/2018	SCPD Annual Report on Biased Policing Complaints 2018	CC_MIL_{Exhibit LLL}	
800	3/30/2018	March 30, 2018 SCPD Compliance Report, with attachments	RPD_0017070 - RPD_0017158	
801	1/1/2019	SCPD Internal Affairs Report 2019		
802	1/1/2020	SCPD Internal Affairs Report 2020		
803	1/1/2014	SCPD Hate Crimes Annual Report 2014, with attachments	RPD_0014492 - RPD_0014524	
804	1/1/2015	SCPD Hate Crimes Annual Report 2015, with attachments	RPD_0015611 - RPD_0015634	
805	1/1/2016	SCPD Hate Crimes Annual Report 2016, with attachments		

**Plaintiffs #1-21 v. County of Suffolk, et al.
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Temp. Doc. ID#	Date	Description	Bates Range	Objections
806	1/1/2017	SCPD Hate Crimes Annual Report 2017	11-25-2019_SelectedMessages.00007727 - 11-25-2019_SelectedMessages.00007736	
807	1/1/2018	SCPD Hate Crimes Annual Report 2018		
808	1/1/2019	SCPD Hate Crimes Report 2019		
809	1/1/2020	SCPD Hate Crimes Report 2020, with attachment		
810	1/1/2015	SCPD Community Relations Report 2015	RPD_0015635 - RPD_0015683	
811	1/1/2015	2015 SCPD Community Response Bureau Report, with attachments		
812	1/1/2018	SCPD Community Relations Report 2018		
813	1/1/2018	SCPD Language Assistance Report 2018		
814	1/1/2019	SCPD Community Relations Report 2019		
815	1/1/2019	SCPD Language Assistance Report 2019		
816	1/1/2020	SCPD Community Relations Report 2020		
817	1/1/2020	SCPD Language Assistance Report 2020		
818	1/5/2016	SCPD Memorandum, Order No. 16-06, Training Notice – Cancellation – Bias Free Policing	D-11449 - D-11449	
819	Undated	Police Academy Bureau deck titled "Bridges: Bias Free Policing"	RPD_0018564 - RPD_0018593	
820	Undated	Suffolk County Police Academy deck titled "Preventing Allegations of Racially Based Policing: 'Officer Awareness is the Key'"	RPD_0018594 - RPD_0018618	
821	Undated	SCPD deck titled "Tactical Policing with Impartial Perceptions"	RPD_0018429 - RPD_0018563	
822	Undated	SCPD deck with cover "Todays Instructors"	D-18471 - D-18518	
823	Undated	SCPD deck titled "Basic Cultural Sensitivity"	RPD_0018621 - RPD_0018651	
824	Undated	SCPD deck titled "Cultural Proficiency"	RPD_0018652 - RPD_0018687	
825	Undated	SCPD Command Report on Uncompleted Tests	9-18-2019_Crawford.00001806 - 9-18-2019_Crawford.00001825	
826	Undated	Deck titled "Bias Free Policing"	CSPD_EM000001916	
827	Undated	Deck titled "Bias Free Policing"	CSPD_EM000001919	
828	1/25/2016	Language Line Academy Language Proficiency Results	RPD_0015864 - RPD_0015883	
829	11/15/2013	SCPD Memorandum, Order No. 13-260, DCJS Conducting Complete Traffic Stops Training	D 5/25/18 - 479 - D 5/25/18 - 480	
830	Undated	Excel titled "SCPD_TStop_Dictionary Finn"	RPD_0021148 - RPD_0021148	
831	2/14/2014	February 14, 2014 SCPD Department General Order: Traffic Stop Data Collection (Order Number 14-11)	D 5/25/18 - 451 - D 5/25/18 - 458	
832	9/16/2015	SCPD Department Special Order: Motorist and Officer Safety During Traffic Stops (Order Number 15-19)	D 5/25/18 - 473 - D 5/25/18 - 474	
833	2/29/2016	SCPD Patrol Division Memorandum: Traffic Stop Data Collection (T-Stop) - Points to Remember (Order Number 16-15)	9-18-2019_CapolinoMB.00000171 - 9-18-2019_CapolinoMB.00000174	
834	3/2/2018	SCPD Department General Order: Traffic Stop Data Collection Rules and Procedures (Chapter 13, Section 9) (Order Number 18-14)		
835	8/30/2010	SCPD Department General Order: Vehicle Traffic Stops (Order Number 10-33)	D 5/25/18-495 - D 5/25/18-496	
836	3/5/2018	SCPD Department Memorandum: D.I.I.T. Training - Traffic Stops Data Collection - 2018 (Order Number 18-50)	D 5/25/18-481 - D 5/25/18-481	
837	2/7/2005	SCPD Department Memorandum: Traffic Stops in Unmarked Vehicles (Order Number 05-63)	D_5_25_18_000466 - D_5_25_18_000466	
838	1/1/2006	2006 Traffic Stop Data	SCPD_EF0000447	Objection - Relevance - Not within the relevant time period of 2012 to the present
839	1/1/2007	2007 Traffic Stop Data	SCPD_EF0000448	Objection - Relevance - Not within the relevant time period of 2012 to the present

ID#	Date	Description	Basis Range	Objectives
PLAINTIFFS' TRIAL EXHIBIT LIST				
840	1/2008	2008 Traffic Stop Data	SCPDE_F0000449	Object - Relevancy - Not within the relevant time period of 2012 to the present
841	1/2009	2009 Traffic Stop Data	SCPDE_F0000450	Object - Relevancy - Not within the relevant time period of 2012 to the present
842	1/2010	2010 Traffic Stop Data	SCPDE_F0000451	Object - Relevancy - Not within the relevant time period of 2012 to the present
843	1/2011	2011 Traffic Stop Data	SCPDE_F0000452	Object - Relevancy - Not within the relevant time period of 2012 to the present
844	1/2012-2019	Incomplete Traffic Stop Data	RPD_0018735	Object - Relevancy - Not within the relevant time period of 2012 to the present
845	1/2012	2012-2013 Traffic Stop Data	RPD_0018835	Object - Relevancy - Not within the relevant time period of 2012 to the present
846	1/2014	2014 Traffic Stop Data	RPD_0021114	Object - Relevancy - Not within the relevant time period of 2012 to the present
847	1/2015	2015 Annual Traffic Stop Preemergencies, Command 0110	RPD_0020340	Object - Relevancy - Not within the relevant time period of 2012 to the present
848	1/2015	2015 Annual Traffic Stop Preemergencies, Command 0220	RPD_0020403	Object - Relevancy - Not within the relevant time period of 2012 to the present
849	1/2015	2015 Annual Traffic Stop Preemergencies, Command 0310	RPD_0020466	Object - Relevancy - Not within the relevant time period of 2012 to the present
850	1/2015	2015 Annual Traffic Stop Preemergencies, Command 0420	RPD_0020531	Object - Relevancy - Not within the relevant time period of 2012 to the present
851	1/2015	2015 Annual Traffic Stop Preemergencies, Command 0520	RPD_0020590	Object - Relevancy - Not within the relevant time period of 2012 to the present
852	1/2015	2015 Annual Traffic Stop Preemergencies, Command 0620	RPD_0020631	Object - Relevancy - Not within the relevant time period of 2012 to the present
853	1/2015	2015 Annual Traffic Stop Preemergencies, Command 0710	RPD_0020723	Object - Relevancy - Not within the relevant time period of 2012 to the present
854	1/2015	2015 Annual Traffic Stop Preemergencies, Command 4210	RPD_0020782	Object - Relevancy - Not within the relevant time period of 2012 to the present
855	1/2015	2015 Traffic Stop Data	RPD_0020844	Object - Relevancy - Not within the relevant time period of 2012 to the present
856	1/2016	1st Quarter 2016 Annual Traffic Stop Preemergencies, Command 0110	RPD_0021116	Object - Relevancy - Not within the relevant time period of 2012 to the present
857	1/2016	1st Quarter 2016 Annual Traffic Stop Preemergencies, Command 0210	RPD_0020874	Object - Relevancy - Not within the relevant time period of 2012 to the present
858	1/2016	1st Quarter 2016 Annual Traffic Stop Preemergencies, Command 0310	RPD_0020946	Object - Relevancy - Not within the relevant time period of 2012 to the present
859	1/2016	1st Quarter 2016 Annual Traffic Stop Preemergencies, Command 0410	RPD_0020947	Object - Relevancy - Not within the relevant time period of 2012 to the present
860	1/2016	1st Quarter 2016 Annual Traffic Stop Preemergencies, Command 0510	RPD_0020970	Object - Relevancy - Not within the relevant time period of 2012 to the present
861	1/2016	1st Quarter 2016 Annual Traffic Stop Preemergencies, Command 0610	RPD_0021000	Object - Relevancy - Not within the relevant time period of 2012 to the present
862	1/2016	1st Quarter 2016 Annual Traffic Stop Preemergencies, Command 0710	RPD_0021040	Object - Relevancy - Not within the relevant time period of 2012 to the present
863	1/2016	1st Quarter 2016 Annual Traffic Stop Preemergencies, Command 4210	RPD_0021060	Object - Relevancy - Not within the relevant time period of 2012 to the present
864	1/2016	2016 Traffic Stop Data	RPD_0021117	Object - Relevancy - Not within the relevant time period of 2012 to the present
865	1/9/2016	Internal Correspondence from M. Wilcken to J. Melchner re: Traffic Stop (T-Slot) Program December 2015 Report	RPD_0021172	Object - Relevancy - Not within the relevant time period of 2012 to the present
866	3/8/2016	Internal Correspondence from J. Melchner to J. Kosciuk re: Traffic Stop (T-Slot) Program January 216 Report	RPD_0020288	Object - Relevancy - Not within the relevant time period of 2012 to the present
867	1/1/2017	2017 Traffic Stop Data	RPD_0021118	Object - Relevancy - Not within the relevant time period of 2012 to the present

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Case No. 15-cv-2431 (E.D.N.Y.)
PLAINTIFFS' TRIAL EXHIBIT LIST

Temp. Doc. ID#	Date	Description	Bates Range	Objections
868	1/1/2018	2018 Traffic Stops, Part 1 (2018A) (Jan 2018 - Dec 2018)	RPD_0021119 - RPD_0021119	
869	1/1/2018	2018 Traffic Stops, Part 2 (2018B) (July 2018 - Dec 2018)	RPD_0021120 - RPD_0021120	
870	4/23/2019	Consultant/Personal Services Contract between SCPD and the Finn Institute	RPD_0017159 - RPD_0017176	
871	Undated	Excel titled "SCPD LPR_Data_20190827 Finn"		
872	Undated	Excel titled "SCPD_TStop_Data Finn"	RPD_0021146 - RPD_0021146	
873	Undated	Excel titled "SCPD_TStop_Data_20190620 Finn"	RPD_0021147 - RPD_0021147	
874	Undated	2019 Traffic Stops, Q1	RPD_0021110 - RPD_0021110	
875	Undated	Data Underlying Analysis of SCPD Traffic Stop Data	03-07-20 Smith 00001 - 03-07-20 Smith 00001	
876	Undated	Data Underlying Post-Stop Outcomes Analysis	03-07-20 Smith 00002 - 03-07-20 Smith 00002	

**This list does not include: (1) demonstrative exhibits; (2) summary evidence presented pursuant to Federal Rule of Evidence 1006; (3) documents used solely as a basis for demonstrative exhibits or summary evidence; or (4) documents relied on by an expert that a party does not intend to introduce into evidence. Plaintiffs reserve the right to modify or supplement this list, including to address arguments and evidence offered by Defendants or rulings by the Court. Plaintiffs further reserve the right to use or offer any document on Defendants' exhibit list, or additional documents that Defendants may offer into evidence. The inclusion of a document on this list does not waive any objection to admissibility or other use of such document in the event it is offered by Defendants. Documents on this list may be subject to motions in limine or other motion practice by the parties, and all or portions of these documents may be excluded from evidence pursuant to those rulings. Nothing on this list should be deemed to waive or contradict any arguments advanced by Plaintiffs during that upcoming pre-trial motion practice. The listing of a document on this list does not require Plaintiffs to offer or use any such document at trial. This list assigns preliminary numbers to the documents listed herein, and the preliminary numbers are not a representation of the numbers that will be ultimately used for, or the order of, the documents used as exhibits at trial.

Plaintiffs #1-21 v. The County of Suffolk, et al.
Plaintiffs' Objections to County Defendants' Schedule of Proposed Exhibits

Exhibit No.	County Defendants' Proposed Exhibit	Plaintiffs' Objections
A.	Plaintiff number 6 traffic records – Plaintiff 6 Production – 000004-000009	FRE 802 (Hearsay); FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice)
B.	Plaintiff number 7 traffic records – Plaintiff 7 Production – 000001-000006	FRE 802 (Hearsay); FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice)
C.	Plaintiff number 8 traffic records – Plaintiff 8 Production – 000001-000002	FRE 802 (Hearsay); FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice)
D.	Plaintiff number 10 traffic records – Plaintiff 10 Production – 000001-000015	FRE 802 (Hearsay); FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice)
E.	Plaintiff number 14 traffic records – Plaintiff 14 Production – 000001-000007	FRE 802 (Hearsay); FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice)
F.	Plaintiff number 15 traffic records – Plaintiff 15 Production – 000004-000013	FRE 802 (Hearsay); FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice)
G.	Plaintiff number 17 traffic records – Plaintiff 17 Production – 000004-000027	FRE 802 (Hearsay); FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice)
H.	Plaintiff number 20 traffic records – Plaintiff 20 Production – 000001-000034	FRE 802 (Hearsay); FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice)
I.	Suffolk County Police Department IAB Report #12-466i D- 14903- D-14931	FRE 802 (Hearsay); FRE 805 (Hearsay within Hearsay)
J.	Suffolk County Police Department IAB Report #16-60i 1/31/19 SC 281 – 1/31/19 SC 375	FRE 802 (Hearsay); FRE 805 (Hearsay within Hearsay)
K.	Department Memorandum Order Number 14-170 Biased-Based Enforcement – D 5/25/18-7 – D 5/25/18-8	
L.	Department General Order 17-42, Bias-Free Policing D 5/25/18- 1 – D 5/25/18-3	
M.	Department General Order 15-52, Bias-Free Policing D 5/25/18- 4 – D 5/25/18-6	
N.	Department Memorandum Order Number 16-237 Trainer Selection Implicit Bias Procedural Justice D 5/25/18-9	

Exhibit No.	County Defendants' Proposed Exhibit	Plaintiffs' Objections
O.	Department Memorandum Order Number 14-144 D.I.I.T. Training – Department of Justice – Bias Free Policing Introduction D 5/25/18-10	
P.	Department Memorandum Order Number 14-76 Bias Incident Complaints D 5/25/18-11	
Q.	Department General Order 15-60, Language Access Plan and Policy D 5/25/18-114 – D 5/25/18-133	
R.	Department General Order 10-13, Vehicle Traffic Stops D 5/25/18-486 – D 5/25/18-494	
S.	Department General Order 10-33, Vehicle Traffic Stops D 5/25/18-495 – D 5/25/18-496	
T.	Department General Order 15-09, Vehicle Traffic Stops D 5/25/18-497 – D 5/25/18-498	
U.	Department General Order 15-09 & 15-47, Vehicle Traffic Stops D 5/25/18-499 – D 5/25/18-510	
V.	Email dated April 16, 2020 from Jude Volek to Chris Love, copying Michael Goldberger (Exhibit Q to County Defendants' motion for summary judgment)	FRE 802 (Hearsay)
W.	Expert Report of Gregory J. Anderson dated June 19, 2020	FRE 802 (Hearsay); FRE 702/703 (Improper Expert Testimony)
X.	Agreement between United States Department of Justice and Suffolk County Police Department D-2261- D-2287	
Y.	Plaintiff 1 Production 000001-000003	FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice)
Z.	Plaintiff 2 Production 000176-000178	FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice)
AA.	Plaintiff 3 Production 000001-000003	FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice)
BB.	Plaintiff 4 Production 000001-000003	FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice)
CC.	Plaintiff 5 Production 000001-000003	FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice)

Exhibit No.	County Defendants' Proposed Exhibit	Plaintiffs' Objections
DD.	Plaintiff 6 Production 000001-000003	FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice)
EE.	Plaintiff 7 Production 000007-000009	FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice)
FF.	Plaintiff 8 Production 000003-000005	FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice)
GG.	Plaintiff 9 Production 000001-000003	FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice)
HH.	Plaintiff 12 Production 000001-000003	FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice)
II.	Plaintiff 13 Production 000001-000003	FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice)
JJ.	Plaintiff 14 Production 000008-000010	FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice)
KK.	Plaintiff 15 Production 000001-000003	FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice)
LL.	Plaintiff 16 Production 000001-000003	FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice)
MM.	Plaintiff 17 Production 000001-000003	FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice)
NN.	Plaintiff 18 Production 000001-000003	FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice)
OO.	Plaintiff 19 Production 000003-000006	FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice)
PP.	Plaintiff 20 Production 000035-000037	FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice)
QQ.	Police paperwork Plaintiff #1 D-19578 – D-19838	FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice, Confusing the Issues, Misleading the Jury, Wasting Time); FRE 404 (Character Evidence; Other Crimes, Wrongs, or Acts); FRE 802 (Hearsay); FRE 805 (Hearsay within Hearsay)

Exhibit No.	County Defendants' Proposed Exhibit	Plaintiff's Objections
RR.	Police paperwork Plaintiff #2 D-19839 – D-19984	FRE 401/402 (Relevance); FRE 403 (Unfair Prejudice, Confusing the Issues, Misleading the Jury, Wasting Time); FRE 404 (Character Evidence; Other Crimes, Wrongs, or Acts); FRE 802 (Hearsay); FRE 805 (Hearsay within Hearsay)